

# EXHIBIT 1

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### Mainland China CDT MAKER Contact Meeting

→Tai Yu file

Meeting SSDD: M.S.Lee, Senior Manager Dong-Yu Xu, Zhen Yang  
 Attendees: PHS: Chubei Cheng-Si Shao, H.K Si-Chuan Lee, Huafei Jian-Zhong  
 Sheng, Yi Wang  
 BMCC: Wen-Chiang Fan, Hsin-Wen Huang  
 IRICO: Chao-Jie Wang  
 CPTF: Chung-Cheng (Alex) Yeh, Wei-Lie Yu

#### I. Production capacity situation of each maker (*kpcs*)

		Production capacity From Jan. to July	7/E <i>stock</i>	Max production capacity				
				August	September	October	November	December
<i>CPTF</i>	14"	370	70	250	220	150	150	150
	15"	25			<del>330</del> [Crossed out]		30	60
<i>BMCC</i>	14"	300	30 - 40	50	50	40	30	25
	15"					10	20	25
IRICO	15"	90	40	50	50	50	50	50
Huafei	14"	640	40	120	120	120	120	120
	15"	25		5-10k/m----->				
<i>SSDD</i>	14"	750	20	150	150	150	150	150
<i>TTL</i>	14"	2060	160-170	570	620	470	450	445
	15"	140		60	60	70	110	145

1. Right now, BMCC has one line producing 14" CPT and 14"/15" CDT and the plan is to produce CDT (50k/M) using half a line. Among it, SAMPLES of 15" CDT have already been produced. Because of material supply and staff training issues, the production of 15" CDT will start from Oct.
2. IRICO has given up 14", and is focusing on 15"; it has produced 20k of 15" in July. These were mainly sold to domestic customers and "Irico Royal".
3. For Huafei's 15" CDT line, after supplying TWN with B+D tubes ITC, it is mainly delivered to ACER. Going forward, it will maintain supply quantity at about 5-10 k/M.  
 Later, they might transfer a production line from Chubei, TWN to Nanjing to produce 15" CDT or they may convert a current line to produce 15" CDT.  
 These two options will be determined at the Q4 board of the director meeting.
4. SSDD still only has one 14" CDT right now and an additional 15" CDT line will be set up either in Tianjin or Shenzhen. However, half of the equipment

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].



for this line has already arrived at Tianjin. Because the orders from Tianjin's *MONITOR* factory are not good, it is, therefore, consideration was given to moving this *CDT* line to Shenzhen.

5. All makers said that the orders in August are okay and the amount of orders has not reduced due to the promotion in July.

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6. Looking at each maker's *STOCK* at the 7/E, Huafei claimed to have 40k *STOCK*. However, it is heard from other sources that it has only about 20k. And *SSDD* has only 20k in stock. It is probably due to large shipments at the end of July especially after Huafei sold to Irico Royal 20k at the price of 36.0 (Also, for July, there was only 20k in *TTL*).

II. At the meeting, analytical charts of *CDT* worldwide demand and supply from each maker's headquarters were *shown* to *BMCC* and *IRICO*; it is to indicate that there are sufficient reasons to increase prices, and to reiterate the bottom price for each size; and that *B* Grade tubes must not be sold and the payment terms.

1. *BMCC* stated that it did not attend the previous meeting and it was not aware of the determination of each maker to increase prices and they have already accepted a *5K*-order from Irico Royal at the price of \$42.0 on August 4. However, since everyone made their stance clear today, *BMCC* will definitely *flw* the bottom line pricing. It also said that the original agreement with *AOC* fell through due to slow process of *SAMPLE* validation and no prices were promised, therefore no deal was made.
2. Huafei *challenged SSDD* and said that a *FAX* to a customer from its *SALES* staff named Tsao stated that if the price increase failed, their money would be refunded in full; it showed that *SSDD* lacked confidence on price increase, and it needs to improve. *SSDD* denied the allegation. All attendees agreed and asked that all makers' *SALES* personnel should watch out the terms they use.
3. Huafei requested that *CPT* to be steadfast in their decision against *AOC*, since *AOC* is the culprit for ruining the price, I clearly indicated that we would rather lose orders than to concede.

### III. Domestic price review

1. *CPTF* questioned each maker's calculation method for domestic sales tax inclusive price by using *USD* x 10 which is of in turn a price cut in disguise. Huafei stated that first of all, they used special techniques to buy materials like glass and others as internal purchase [Underlined] to offset the value-added tax, and secondly, local government has VAT waiver [Underlined], so as a result, the profit of domestic sales is higher than export sales. So it insisted on calculating by 10.
2. *SSDD* said for domestic sales price they *flw* other makers "x10 method". But in fact, it is more beneficial to use 10.3 because the tariff is only about 6% [Underlined].
3. *CPT* said the tariff for *CDT* is 12% and *CPTF* used materials to calculate tariff which account for about 10% of the *cost (TUBE)*. So, 10.68 should be used.

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Translator's remarks are indicated in brackets [ ].

4. Other 2 makers expressed that they are worried that domestic customers would not accept, so they wanted to use 10 to calculate as well. Due to substantial disputes over this matter, it was tabled for discussion at the next *meeting*.

IV. All makers decided that Huafei will call the next meeting on 9/4 to be held in Nanjing. (In principle it would be held once a month). And it was proposed to invite Senior Manager Lu of *CPTM* to attend.

- End of report -

Submitted by Employee Chung-Cheng (Alex) Yeh 8/5  
'98

[Initialed:] Y.M. Peng Aug 11 '98

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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00886-3-4858094

0591-3970507

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030663E



司 蔡 隆 CDT MAKER 建 蔡 会 议

年 月 日  
第 页 共 页

参会人员:

SSDD: M.S. Lee, 徐東煌 经理, 楊真

PHS: 竹北 邵正通, H.K. 蔡思泉, 华和 葛建忠, 王毅

BMCC: 范文强, 黄新文

彩虹: 王昭杰

CPTI: 蔡俊正, 余俾列

一、各家产能概況 (K pcs)

		1~7月產量	1/2 stock	最大產能				
				8	9	10	11	12
CPTI	14"	370	70	250	300	ND	ND	ND
	15"	25					30	60
BMCC	14"	300	30-40	50	50	40	20	25
	15"					10	20	25
彩虹	15"	90	40	50	50	50	50	50
華飛	14"	640	40	120	120	120	120	120
	15"	25		5~10 K/H				
SSDD	14"	750	20	150	ND	ND	ND	150
TTL	14"	2060	160~170	570	620	470	450	445
	15"	140		60	60	70	110	145

1. BMCC 現有一線生產 14" CPT, 14/15" CDT, 規劃用半線做 CDT (50 K/H)

其中 15" CDT SAMPLE 已產出, 由於材料供應, 及人員培訓問題

計劃 10月開始投產 15" CDT.

2. 彩虹放棄 14", 專攻 15" 7月產出 20K, 主要銷售國內客戶及彩虹

3. 華飛 15" CPT 7月, TWIN 供應 40 K, 2TC 後, 主要交給 ACR, 後續仍將維持 5~10 K/H 的供應量.

後續可能自 TWIN 轉竹北拆一條線遷到南京生產 15" CDT.

現自現有生產線改造一條生產 15" CDT. 4位董事會將兩果擇一辦理

4. SSDD 現仍只有一條 14" CDT, 另有 1 條 15" 的增設, 全在天津或深圳, 擇一地設立, 但此線已有近一半的設備已運抵天津. 因天津 HUIZOR 廠訂單不佳, 才有移來深圳的考量.

5. 各家均表示, 8月訂單皆尚好, 並未因 7月產銷而銳減.

中華映管福州有限公司



6. 依各家 1% stock 看来, 華能称 stock 40K, 但從其他管道得知, 已有 20K 左右, 而 SSD 只剩 20K, 應是 1% 大量出清, 尤其是華能用 36.0 的價格賣給彩皇 20K (且 1A TTL 也有 20K)。

二、会议上向 BMCC 及彩虹 show 各家总部的全球 CDT 供需分析表表示, 有足够理由, 調漲價格, 並重申各尺寸的底限價, 不得賤 B 貨, 及付款條件。

1. BMCC 則表示, 先前來參加會議, 不知各家漲價的決心, 但放在 8/4 已向彩皇用 42.0 之價承訂 JK 的訂單, 但今日大家表態, 應明確表示, BMCC 一定 follow 底限價。  
 另表示, 原與 Acc 的協議, 因 sample 承認進度延緩, 且 ~~未~~ 並未承諾價格, 故對 Acc 交易沒有談成。

2. 華能 challenge SSD 及曾姓 sales, 給某家客戶的 FAX 談若沒三張成功, 將來一定是全數退款, 顯示, 缺乏調漲的信心, 要求更改, SSD 否認, 但全體同意再要求各 sales 要注意用詞。

3. 華能要求 CPT 對 Acc 要堅守決心, 因為 Acc 是價格破壞者, 取則明確表示, 寧可沒訂單, 也不會讓步。

### 三、內銷價格檢討

1. CPT 質疑各家, 用 USD  $\times 10$  <sup>核算</sup> 內銷含稅價, 等於变相降價, 華能則表示, 一來其使用特殊手段, 使玻璃 ~~等~~ 含材料變為內購, 增值稅予互抵, 二來其當地政府有增值稅減免, 其內銷的利潤還高於外銷, 故堅持用 10 核算。

2. SSD 則表示, 現其內銷時, follow 其他家作法,  $\times 10$ , 但其實際, 應用 10.3 較划算, 因其 ~~因~~ 因稅約為 6% 而已。

3. CPT 則表示, CDT 因稅 12%, CPT 因材料核算因稅約為 10% 故應用 10.68 來算。

4. 另兩家則表示, 擔心國內部不接價, 故也贊成用 10 核算, 因爭議頗大, 留待下次 meeting 再議。

四、大家決議, 9/4 由華能任召集人在南京召開 (原則上每月一次) 下次會議, 擬請 CPT 呂經理, 也能支同每會。

以上報告

中華映管福州有限公司

00 886-3-4858074

05 P1-3P70507

# EXHIBIT 2



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT) ) MASTER FILE NO.  
ANTITRUST LITIGATION ) CV-07-5944 JST

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THIS DOCUMENT RELATES TO: )  
 )

ALL INDIRECT PURCHASER ACTIONS )  
ALL DIRECT PURCHASER ACTIONS )

)  
DEFENDANTS. )

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VIDEOTAPED DEPOSITION OF YAN YUNLONG  
VOLUME I  
TUESDAY, SEPTEMBER 27, 2022  
MACAU S.A.R., CHINA

FILE NO. SF 5436473

REPORTED BY MARK McCLURE, CRR  
CAL CSR 12203

1	A. I think it was Mr. Xing Daoqin of the Group	14:46
2	company.	14:46
3	Q. Were you involved in the decision to retain	14:46
4	Pillsbury?	14:46
5	A. I was involved.	14:46
6	Q. Did you meet with Pillsbury lawyers about the	14:46
7	issue of retaining Pillsbury?	14:46
8	A. We met.	14:47
9	Q. Did you meet with Pillsbury before they were	14:47
10	actually retained to represent Irico?	14:47
11	A. No.	14:47
12	MR. BIRKHAUSER: Okay. We're about to run	14:47
13	out of videotape, so why don't we go off the record.	14:47
14	THE VIDEOGRAPHER: We are now going off the	14:47
15	record. The time is 2:48.	14:47
16	(Discussion off the record.)	14:48
17	THE VIDEOGRAPHER: We are now back on the	15:01
18	record. The time is 3:01.	15:01
19	BY MR. BIRKHAUSER:	15:01
20	Q. All right, Mr. Yan, after Irico received a	15:01
21	copy of the complaint in this matter, did it conduct any	15:01
22	investigation into the facts that are alleged in the	15:01
23	complaint?	15:01
24	A. No.	15:01
25	Q. Did Pillsbury ever tell Irico that it should	15:02

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1 investigate the facts that are alleged in the complaint? 15:02

2 MR. CARTER: Objection. Calls for 15:02

3 attorney-client privileged information. Instruct the 15:02

4 witness not to answer to the extent it would reveal any 15:02

5 legal advice given or received by Pillsbury. 15:02

6 THE WITNESS: I will take back my earlier 15:03

7 answer. 15:03

8 BY MR. BIRKHAEUSER:

9 Q. I don't know what you're saying. 15:03

10 When you said you'd take back your earlier 15:03

11 answer, are you -- strike that. 15:03

12 Did Irigo conduct an investigation into the 15:03

13 facts alleged in plaintiffs' complaint? 15:03

14 MR. CARTER: Objection. Asked and answered. 15:03

15 BY MR. BIRKHAEUSER: 15:04

16 Q. You can answer. 15:04

17 A. Okay. After we received this complaint from 15:05

18 the U.S., we consulted our attorneys and we also felt 15:05

19 that it was quite strange that the U.S. would conduct a 15:05

20 CRT antitrust investigation against us, but at that time 15:05

21 our focus was on whether or not Irigo had any products 15:05

22 that were sold in the U.S., and we also later clarified 15:05

23 on that issue, and indeed, we did not have any 15:05

24 mass-produced products sold in the U.S., so the 15:05

25 complaint against us was entirely baseless. 15:05

1 Q. What kind of investigation did you conduct to 15:05  
2 reach the conclusion that the complaint against Irigo 15:05  
3 was baseless? 15:06  
4 A. We contracted a company to search the database 15:06  
5 of Chinese customs for the data of our products -- of 15:06  
6 our export products during the relevant period, and the 15:06  
7 investigation scope covered all of those products we 15:07  
8 exported in that time frame, and the data showed that we 15:07  
9 did not export any products to the U.S. market, so it 15:07  
10 made no sense to file such a complaint against us. 15:07  
11 Q. When did you contract with a company to search 15:07  
12 the database of Chinese customs? 15:07  
13 A. It was around the beginning of 2008. 15:07  
14 Q. What was the name of the company? 15:07  
15 A. I don't remember the name, but I think it's in 15:07  
16 our document production. That company also issued a 15:08  
17 certificate to prove the search result. 15:08  
18 Q. As best as you can recall, as you sit here 15:08  
19 today, what was the name of that company? 15:08  
20 A. I really cannot recall. It has been a very 15:08  
21 long time. 15:08  
22 Q. What exactly did you tell that company to 15:08  
23 search for? 15:08  
24 A. I was not the person who approached that 15:08  
25 company. It was the staff of the Irigo Group Sales 15:09

1 the complaint other than this report by the person that 15:21  
2 Irico contracted with? 15:21  
3 MR. CARTER: Object to form. 15:21  
4 THE WITNESS: No. 15:22  
5 BY MR. BIRKHAEUSER: 15:22  
6 Q. At the time you were investigating the facts 15:22  
7 of the complaint, did any Irico employee tell you that 15:22  
8 they had attended meetings with Irico's competitors? 15:22  
9 A. They did. 15:22  
10 Q. And what kind of investigation did you do as 15:23  
11 to the meetings that Irico had with its competitors? 15:23  
12 A. We did not conduct any special investigation. 15:23  
13 We simply confirmed whether or not there was such a 15:23  
14 fact. 15:23  
15 Q. Who told you that Irico employees attended 15:23  
16 meetings with Irico's competitors? 15:23  
17 A. At that time, it was Liu Maihai, Shen Xiaolin, 15:23  
18 and there was another person who used to work for CEIEC, 15:24  
19 and that person's name was Liang Yuan. That's it. 15:24  
20 Q. Did Shen Xiaolin tell you that Mr. Shen had 15:25  
21 attended a meeting of CEOs and presidents of CRT 15:25  
22 competitors in Shanghai in November of 2006? 15:25  
23 MR. CARTER: Object to form. 15:25  
24 THE WITNESS: It was not as detailed as to 15:25  
25 exactly which meeting. 15:25

1 BY MR. BIRKHAUSER:

2 Q. Did anyone tell you how many meetings that 15:25  
3 Irico employees had had with Irico's competitors? 15:25

4 A. No. 15:26

5 Q. Were you preliminary responsible for gathering 15:26  
6 information to give to Pillsbury after you were served 15:26  
7 with the complaint? 15:26

8 MR. CARTER: Object to form. 15:26

9 THE WITNESS: No. Actually, after we were 15:27  
10 served the complaint, we did several things. 15:27

11 The first one was -- we formed an internal 15:27  
12 working group to lead the work of conducting the 15:28  
13 investigation with respect to this litigation. It was a 15:28  
14 task force working group. 15:28

15 Secondly, we engaged Pillsbury as the counsel 15:28  
16 to represent us, but at that time several law firms were 15:28  
17 pitching us for the case, and we later talked with them 15:28  
18 and engaged Pillsbury as our outside counsel. 15:28

19 The third one we did -- the third thing we did 15:28  
20 was that we conducted an investigation to see if we 15:28  
21 actually sold any products in the U.S. market, and the 15:28  
22 information we got was no. So we asked Pillsbury to try 15:28  
23 to talk and reason with the plaintiffs that it was a 15:28  
24 mistake to sue Irico, and we asked them to remove us 15:28  
25 from the defendants. 15:28

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1           The fourth thing that we did was to notify all           15:29  
2     the relevant people based on the request from Pillsbury,           15:29  
3     and those people were asked to preserve all the           15:29  
4     information and documents related to the case.           15:29

5           During that process, Pillsbury related a very           15:30  
6     important piece of information to us. It told us that           15:30  
7     it was actually a class action and the plaintiffs in the           15:30  
8     case were trying to form a group of plaintiffs to           15:30  
9     conduct the litigation, and the defendants were also           15:30  
10    trying to form a group, and Pillsbury's advice to us was           15:30  
11    that we join the defendants group. So, internally, in           15:30  
12    the company, we also held some discussions on that           15:30  
13    advice.           15:30

14           And the company held several rounds of           15:31  
15    discussions on that issue in order to understand the           15:31  
16    situation, but the situation with Irico is different           15:31  
17    from that with other companies in the defendants' group.           15:31  
18    Those other companies were big multinational companies           15:31  
19    and the U.S. market was their main market. They not           15:31  
20    only had CRT products in the U.S. market, they also had           15:31  
21    the TV whole sets in the U.S. market, and Irico, at that           15:31  
22    time, had neither, so it was to the disadvantage of           15:32  
23    Irico to join and form the defendants group.           15:32

24           And also, at that time, the U.S. government           15:32  
25    was conducting, actually, criminal investigations in the           15:32

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT) ) MASTER FILE NO.  
ANTITRUST LITIGATION ) CV-07-5944 JST

\_\_\_\_\_ )

THIS DOCUMENT RELATES TO: )

ALL INDIRECT PURCHASER ACTIONS )

ALL DIRECT PURCHASER ACTIONS )

DEFENDANTS. )

\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF YAN YUNLONG  
VOLUME III  
THURSDAY, SEPTEMBER 29, 2022  
MACAU S.A.R., CHINA

FILE NO. SF 5436477

REPORTED BY MARK McCLURE, CRR  
CAL CSR 12203



1 foundation. Improper legal opinion. 09:50:51

2 THE WITNESS: My understanding is that the 09:51:25

3 ex-factory prices of our Irico CRT products should not 09:51:28

4 be below the average production cost published by the 09:51:34

5 national government agencies, as referenced earlier; 09:51:41

6 which means that for each of the 20-inch color picture 09:52:07

7 tube that we manufacture, the price cannot go lower than 09:52:10

8 440 RMB, and the price of the 25-inch color picture tube 09:52:18

9 should not go lower than 720 RMB. 09:52:25

10 BY MR. CARTER: 09:52:25

11 Q. Mr. Yan, looking back at page 460, with the 09:52:45

12 newspaper clipping -- 09:52:48

13 A. Okay. 09:52:54

14 Q. -- the table at the bottom of that clipping is 09:52:55

15 titled "Industrial Average Production Cost," correct? 09:52:58

16 MR. RUSHING: Objection to form. 09:53:10

17 THE WITNESS: Yes. 09:53:11

18 BY MR. CARTER: 09:53:11

19 Q. To your understanding, if Irico Group's 09:53:17

20 production costs were lower than the industry average, 09:53:21

21 could Irico Group lawfully price its CRTs below these 09:53:27

22 levels? 09:53:32

23 MR. RUSHING: Objection to form. Lack of 09:53:33

24 foundation. Calls for an improper legal opinion. 09:53:36

25 THE WITNESS: No. 09:54:10

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1 MR. BIRKHAUSER: Objection on the grounds 09:54:10  
2 that it mischaracterizes the document. 09:54:12  
3 Objection. Objection on the ground that it 09:54:15  
4 mischaracterizes the document. 09:54:18  
5 BY MR. CARTER: 09:54:28  
6 Q. What's your understanding of what would happen 09:54:28  
7 if Irico Group sold CRTs at prices below these published 09:54:30  
8 industrial average production costs? 09:54:35  
9 MR. RUSHING: Objection to form. Lacks 09:54:38  
10 foundation. Calls for an improper legal opinion. 09:54:42  
11 THE WITNESS: According to my understanding, 09:55:23  
12 our company would have to bear legal liabilities and it 09:55:25  
13 will face punishments, and those people at the company 09:55:31  
14 at the leadership level who have direct responsibility 09:55:37  
15 regarding this would also face personal punishment. 09:55:40  
16 MR. BIRKHAUSER: Objection on the ground that 09:55:47  
17 it mischaracterizes the very language of the document 09:55:48  
18 itself. 09:55:51  
19 BY MR. CARTER: 09:55:51  
20 Q. Mr. Yan, you can set that document aside, and 09:56:00  
21 I have one other document that I'm going to introduce, 09:56:03  
22 if you give me a moment. 09:56:06  
23 Mr. Yan, I'm introducing what was previously 09:56:29  
24 marked as Exhibit 8551. Please refresh your page and 09:56:32  
25 let me know when you see that. 09:56:36

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# EXHIBIT 3

March 06, 2019

1

Page 1

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
San Francisco Division

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IN RE: )  
)  
CATHODE RAY TUBE (CRT) ) Master File No.  
ANTITRUST LITIGATION ) 07-CV-5944-JST  
)  
) MDL No. 1917  
)  
)  
)  
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DEPOSITION OF WANG ZHAOJIE

HIGHLY CONFIDENTIAL

VOLUME I

Wednesday, March 6th, 2019

AT: 9.08 am

Taken at:

Kobre & Kim  
6/F ICBC Tower  
3 Garden Road  
Central  
Hong Kong

Court Reporter:

Bron Williams  
Accredited Real-time Reporter

March 06, 2019

6 to 9

<p style="text-align: right;">Page 6</p> <p>1 invoice</p> <p>2 Exhibit 8411 Bates number .....103</p> <p style="padding-left: 40px;">IRI-CRT-00003588 - Export</p> <p>3 invoice</p> <p>4 Exhibit 8412 Bates number .....105</p> <p style="padding-left: 40px;">IRI-CRT-00003594 - Export</p> <p>5 invoice</p> <p>6 Exhibit 8413 Bates number .....109</p> <p style="padding-left: 40px;">IRI-CRT-00003546 - Material</p> <p style="padding-left: 40px;">from a database file</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 MR MONTANO: Michael Montano, Cotchett, Pitre &amp;</p> <p>2 McCarthy on behalf of the direct purchaser plaintiffs.</p> <p>3 MR. PLUNKETT: Stuart Plunkett from Baker Botts on</p> <p>4 before of the Irico defendants and the witness.</p> <p>5 MS. YANG: Kaylee Yang from Baker Botts llp on</p> <p>6 behalf of the Irico defendants.</p> <p>7 MR. JACOBSMEYER: Brian Jacobsmeyer from Baker</p> <p>8 Botts LLP on behalf of the Irico defendants and the witness.</p> <p>9 VIDEOGRAPHER: Would all others please state your</p> <p>10 name for the record.</p> <p>11 MS. GUO: Guo Xiao Yan.</p> <p>12 MS. SHANG: Ting Shang.</p> <p>13 INTERPRETER: Kuang-Shai Chao. I am the</p> <p>14 interpreter.</p> <p>15 VIDEOGRAPHER: The court reporter today is Bron</p> <p>16 Williams on behalf of US Legal Support. Would the reporter</p> <p>17 swear in the interpreters and the witness.</p> <p>18 INTERPRETER - Kuang-Shai Chao (affirmed)</p> <p>19 QIANWEI FU - (affirmed) - acting as a check interpreter</p> <p>20 DAVID HWU - (affirmed) - acting as a check interpreter</p> <p>21 WANG ZHAOJIE</p> <p>22 having been duly affirmed testified as follows:</p> <p>23 (All answers were given through the interpreter unless</p> <p>24 otherwise indicated)</p> <p>25 MR. HWU: I hate to interrupt, but the live screen</p>
<p style="text-align: right;">Page 7</p> <p>1 VIDEOGRAPHER: Good morning. Here begins</p> <p>2 volume I, media number 1 in the deposition of Wang Zhaojie</p> <p>3 in the matter of In Re Cathode Ray Tube (CRT) Antitrust</p> <p>4 Litigation, in the United States District Court, Northern</p> <p>5 District of California, San Francisco division. Master file</p> <p>6 number 07-CV-5944-JST. MDL No. 1 917.</p> <p>7 Today's date is March 6, 2019. The time on the</p> <p>8 video monitor is 9.08 a.m.</p> <p>9 The certified video operator today is Inga Kornev,</p> <p>10 contracted by US Legal Support. This video deposition is</p> <p>11 taking place at Kobre &amp; Kim, ICBC Tower, 3 Garden Road,</p> <p>12 Central, Hong Kong. Counsel, please voice identify</p> <p>13 yourselves and state whom you represent.</p> <p>14 MR. BENZ: Steven Benz from the law firm Kellogg,</p> <p>15 Hansen PLLC, Washington DC, for the direct purchaser</p> <p>16 Plaintiffs.</p> <p>17 MR. HWU: David Hwu from the law firm of</p> <p>18 Saveri &amp; Saveri in San Francisco on behalf of the direct</p> <p>19 purchaser Plaintiffs.</p> <p>20 MS. FU: Qianwei Fu, Zelle LLP on behalf of the</p> <p>21 indirect purchaser Plaintiffs.</p> <p>22 MS. CAPURRO: Lauren Capurro from Trump, Alioto,</p> <p>23 Trump &amp; Prescott for the indirect purchaser plaintiffs.</p> <p>24 MR. MARGO: Benjamin Margo, the Kellogg Hansen law</p> <p>25 firm, for the direct purchaser plaintiffs.</p>	<p style="text-align: right;">Page 9</p> <p>1 for our check interpreter is not working. So could we go</p> <p>2 off the record to fix this really quick?</p> <p>3 VIDEOGRAPHER: Going off -- this marks the end of</p> <p>4 media number 1 of the deposition of Wang Zhaojie. Going off</p> <p>5 the record. The time is 9.11.</p> <p>6 (Break taken.)</p> <p>7 VIDEOGRAPHER: We are back on the record. Here</p> <p>8 begins media 2 in the deposition of Wang Zhaojie, the time</p> <p>9 is 9.12.</p> <p>10 BY MR. BENZ:</p> <p>11 Q. Good morning, Mr. Wang. My name is Steven</p> <p>12 Benz and I represent the direct purchaser plaintiffs in this</p> <p>13 litigation.</p> <p>14 Can you please state your full name and spell it</p> <p>15 for the record.</p> <p>16 A. (Chinese spoken).</p> <p>17 INTERPRETER: (Chinese spoken).</p> <p>18 A. My name is Wang Zhaojie, spelled as W-A-N-G,</p> <p>19 Z-H-A-O-J-I-E.</p> <p>20 BY MR. BENZ:</p> <p>21 Q. Have you ever gone by any other name?</p> <p>22 A. No.</p> <p>23 Q. Do you have a nickname?</p> <p>24 A. What do you mean by that nickname?</p> <p>25 Q. A name that your friends call that you is not</p>

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<p style="text-align: right;">Page 78</p> <p>1 representative, correct?</p> <p>2 A. The document said Liang Yuan.</p> <p>3 Q. Do you know who Liang Yuan is?</p> <p>4 A. Yes, I do know.</p> <p>5 Q. How do you know Liang Yuan?</p> <p>6 A. He is an employee of China National Electronic</p> <p>7 Import and Export Caihong Company.</p> <p>8 Q. At this time, Liang Yuan was also a Group</p> <p>9 employee, correct?</p> <p>10 MR. PLUNKETT: Object to the form.</p> <p>11 A. No, that's not correct.</p> <p>12 BY MR. BENZ:</p> <p>13 Q. Do you know that around this time Irico Group</p> <p>14 sent Liang Yuan to testify on behalf of Irico Group in</p> <p>15 a European anti-dumping case?</p> <p>16 MR. PLUNKETT: Object to the form.</p> <p>17 A. I don't know.</p> <p>18 BY MR. BENZ:</p> <p>19 Q. Just to be clear, Mr. Wang, is Liang Yuan</p> <p>20 a man or a woman?</p> <p>21 A. Ms. Liang Yuan. A female.</p> <p>22 Q. The next line of questions in the document are</p> <p>23 topics 4 and 7.</p> <p>24 Are you aware that in 1995 Irico Group had a sales</p> <p>25 company in the United States called Irico USA?</p>	<p style="text-align: right;">Page 80</p> <p>1 A. No.</p> <p>2 Q. Do you have any understanding as to, within</p> <p>3 the time period at issue in this litigation, how many Irico</p> <p>4 CRTs and CPTs ended up in the United States?</p> <p>5 MR. PLUNKETT: Object to the form.</p> <p>6 Counsel, may I ask if the two people sitting next</p> <p>7 to you are check translators in this deposition? Because it</p> <p>8 seems that they are passing substantive questions to you,</p> <p>9 but they are also acting as check translators.</p> <p>10 MR. BENZ: I'm going to keep asking my questions.</p> <p>11 If you have an objection you can state it for the record.</p> <p>12 MR. PLUNKETT: I'm asking for a clarification of</p> <p>13 that issue. If you disagree that that is what is taking</p> <p>14 place in the room, I suggest you say so.</p> <p>15 MR. BENZ: I have one check translator, and I have</p> <p>16 one person assisting me with questions.</p> <p>17 MR. PLUNKETT: And that's the same person.</p> <p>18 MR. BENZ: No, it has changed. Right now --</p> <p>19 MR. PLUNKETT: Who is the check translator right</p> <p>20 now in the deposition?</p> <p>21 MR. BENZ: The check translator right now is</p> <p>22 Ms. Fu.</p> <p>23 MR. PLUNKETT: Okay.</p> <p>24 MR. BENZ: And Mr. David Hwu is assisting me with</p> <p>25 questions. As you can see, because he has been passing me</p>
<p style="text-align: right;">Page 79</p> <p>1 MR. PLUNKETT: Objection, misstates the record.</p> <p>2 A. I don't know.</p> <p>3 BY MR. BENZ:</p> <p>4 Q. While you worked in sales at Irico, were you</p> <p>5 aware of an entity called Irico USA?</p> <p>6 A. I don't know.</p> <p>7 Q. Have you ever been aware of a company called</p> <p>8 Irico USA?</p> <p>9 A. Yes, I heard of it.</p> <p>10 Q. When did you hear of Irico USA?</p> <p>11 A. I saw this name in the document.</p> <p>12 Q. You were at the sales department for over two</p> <p>13 decades, correct, Mr. Wang?</p> <p>14 A. Let me think about it. Yes, roughly.</p> <p>15 Q. And you are here on behalf of Irico Group and</p> <p>16 Irico Display to testify in response to topics 4 and 7,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. Can you tell me who in Irico Group sales</p> <p>20 department was responsible for coordinating sales to Irico</p> <p>21 USA?</p> <p>22 MR. PLUNKETT: Object to the form.</p> <p>23 A. I don't know.</p> <p>24 BY MR. BENZ:</p> <p>25 Q. Did Group sell CRTs to Irico USA?</p>	<p style="text-align: right;">Page 81</p> <p>1 notes.</p> <p>2 MR. PLUNKETT: Okay, but he also corrected</p> <p>3 a translation recently, which is why I got confused, and</p> <p>4 I believe that the other person is also passing questions to</p> <p>5 you -- at least that's how it appears -- and is not just</p> <p>6 acting as a check translator. If that's not true, you can</p> <p>7 correct that on the record.</p> <p>8 MR. BENZ: Okay. We will continue.</p> <p>9 I'm going to re-ask a question, because I don't</p> <p>10 believe I got a response from you, due to counsel's</p> <p>11 objection.</p> <p>12 Q. Do you have any understanding, Mr. Wang, as</p> <p>13 to, within the time period at issue in this litigation, how</p> <p>14 many Irico CRTs and CPTs ended up either directly or</p> <p>15 indirectly in the United States?</p> <p>16 MR. PLUNKETT: Object to the form.</p> <p>17 A. Irico Display and Irico Group never sell</p> <p>18 products to the States.</p> <p>19 BY MR. BENZ:</p> <p>20 Q. I understand that, but my question for you is,</p> <p>21 regardless of the distribution channel, whether you made any</p> <p>22 attempt in your preparation for today's deposition, to</p> <p>23 determine the amount of sales, attempted sales, or</p> <p>24 contemplated sales, by Irico, either directly or indirectly</p> <p>25 to the United States during the class period. And I mean</p>

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<p style="text-align: right;">Page 82</p> <p>1 indirectly. It could have had multiple intermediaries</p> <p>2 involved.</p> <p>3 So that's my question.</p> <p>4 MR. PLUNKETT: Object to the form.</p> <p>5 A. I don't know.</p> <p>6 BY MR. BENZ:</p> <p>7 Q. Did Irico Electronics sell CRTs to Irico USA</p> <p>8 during the class period?</p> <p>9 A. Based on my understanding, the answer is no.</p> <p>10 Q. I would like to show the witness what has</p> <p>11 previously been marked as Exhibit 8392.</p> <p>12 (Previously marked Exhibit 8392 shown to witness)</p> <p>13 This is also topics 4 and 7.</p> <p>14 I have handed Mr. Wang Exhibit 8392. It is</p> <p>15 a document dated 27th July 2001 from the auditing department</p> <p>16 at Irico Group Corporation. The Bates numbers are</p> <p>17 IRI-CRT-0003490 through 3497.</p> <p>18 Please take as much time as you need, Mr. Wang.</p> <p>19 A. Yes.</p> <p>20 Q. Do you have an understanding as to what this</p> <p>21 document is?</p> <p>22 A. I reviewed this document.</p> <p>23 Q. Did you review this document in preparation</p> <p>24 for your deposition?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 department from Irico Group.</p> <p>2 BY MR. BENZ:</p> <p>3 Q. And this document was kept in Irico Group's</p> <p>4 files, correct?</p> <p>5 A. It should be.</p> <p>6 Q. Do you have any reason to believe this is not</p> <p>7 an accurate, true and correct copy of this document?</p> <p>8 A. No.</p> <p>9 Q. If you could, court reporter, give the witness</p> <p>10 Exhibit 8393, previously marked.</p> <p>11 (Previously marked Exhibit 8393 handed to the witness)</p> <p>12 Mr. Wang, I handed you Exhibit 8393. It is</p> <p>13 a two-page-exhibit with Bates numbers IRI-CRT0003498</p> <p>14 through 3499. Have you seen this exhibit before?</p> <p>15 A. Yes, I saw it before.</p> <p>16 Q. Do you have an understanding as to the purpose</p> <p>17 of this document?</p> <p>18 MR. PLUNKETT: Object to form.</p> <p>19 A. I don't understand.</p> <p>20 BY MR. BENZ:</p> <p>21 Q. What is this document?</p> <p>22 A. I don't know.</p> <p>23 Q. Have you had a chance to review this?</p> <p>24 A. Yes.</p> <p>25 Q. Is it fair to say this is Shaanxi province</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. What is your understanding as to the purpose</p> <p>2 of this document?</p> <p>3 A. I don't know.</p> <p>4 Q. Can you look at the header on the first page</p> <p>5 of the document?</p> <p>6 Do you see at the top where it says "IRICO Group</p> <p>7 Corporation Auditing Department Document"?</p> <p>8 A. Yes.</p> <p>9 Q. And then below that it says:</p> <p>10 "Irico auditing (2001) No. 1."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And then below that it says:</p> <p>14 "A Brief on Auditing Results for IRICO (USA) Inc."</p> <p>15 Do you see that?</p> <p>16 A. Yes, I saw it.</p> <p>17 Q. Does this appear to you to be a document</p> <p>18 created by the Irico Group Corporation auditing department</p> <p>19 on or about 27th July 2001?</p> <p>20 MR. PLUNKETT: Object to the form.</p> <p>21 A. (Chinese spoken).</p> <p>22 INTERPRETER: The witness is asking me to repeat</p> <p>23 the question.</p> <p>24 (Chinese spoken).</p> <p>25 A. This is a document from the auditing</p>	<p style="text-align: right;">Page 85</p> <p>1 People's Government's approval of CNEICC's establishment of</p> <p>2 Irico USA?</p> <p>3 MR. PLUNKETT: Objection to form.</p> <p>4 A. The document speaks for itself.</p> <p>5 BY MR. BENZ:</p> <p>6 Q. Mr. Wang. This exhibit was produced to us by</p> <p>7 the lawyers in -- your lawyers, and it came from Irico</p> <p>8 Group's files. Do you understand that?</p> <p>9 A. Yes, I do.</p> <p>10 Q. And you believe that you have been prepared to</p> <p>11 speak to topics 4 and 7 at your deposition here today,</p> <p>12 correct?</p> <p>13 A. Yes.</p> <p>14 Q. So I'm asking you what is your understanding</p> <p>15 as the corporate designee for Irico Group and Irico Display</p> <p>16 as to the purpose of this exhibit as it relates to topics 4</p> <p>17 and 7?</p> <p>18 MR. PLUNKETT: Objection, vague.</p> <p>19 A. (Chinese spoken).</p> <p>20 BY MR. BENZ:</p> <p>21 Q. What was his answer?</p> <p>22 A. Please repeat the question.</p> <p>23 INTERPRETER: (Chinese spoken).</p> <p>24 A. Could you repeat your question one more time?</p> <p>25</p>



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<p style="text-align: right;">Page 114</p> <p>1 and recontinuing tomorrow, at 9 a.m.</p> <p>2 MR. PLUNKETT: Agreed.</p> <p>3 VIDEOGRAPHER: This is the end of media number 9,</p> <p>4 and volume I of the deposition of Wang Zhaojie. Going off</p> <p>5 the record. The time is 5.55.</p> <p>6 (Whereupon, the deposition adjourned at 5.55 pm)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 116</p> <p>1</p> <p>2 CERTIFICATE OF DEPONENT</p> <p>3</p> <p>4 I, Wang Zhaojie, hereby certify that I have read the</p> <p>5 foregoing pages, numbered 1 through 115, of my deposition of</p> <p>6 testimony taken in these proceedings on Wednesday, March</p> <p>7 6th, 2019 and, with the exception of the changes listed on</p> <p>8 the next page and/or corrections, if any, find them to be a</p> <p>9 true and accurate transcription thereof.</p> <p>10</p> <p>11 Signed: .....</p> <p>12 Name: Wang Zhaojie</p> <p>13 Date: .....</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 115</p> <p>1 CERTIFICATE OF COURT REPORTER</p> <p>2</p> <p>3 I, Bron Williams, an Accredited Real-time Reporter, hereby</p> <p>4 certify that the testimony of the witness Wang Zhaojie in</p> <p>5 the foregoing transcript, numbered pages 1 through 115,</p> <p>6 taken on this 6th day of March, 2019 was recorded by me in</p> <p>7 machine shorthand and was thereafter transcribed by me; and</p> <p>8 that the foregoing transcript is a true and accurate</p> <p>9 verbatim record of the said testimony.</p> <p>10</p> <p>11</p> <p>12 I further certify that I am not a relative, employee,</p> <p>13 counsel or financially involved with any of the parties to</p> <p>14 the within cause, nor am I an employee or relative of any</p> <p>15 counsel for the parties, nor am I in any way interested in</p> <p>16 the outcome of the within cause.</p> <p>17</p> <p>18</p> <p>19 Signed: <i>Bron Williams</i></p> <p>20 Name: Bron Williams</p> <p>21 Date: .....</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 117</p> <p>1</p> <p>2 ERRATA SHEET</p> <p>3 Case Name: In Re Cathode Ray Tube Antitrust</p> <p>4 Litigation</p> <p>5 Witness Name: Wang Zhaojie</p> <p>6 Date: 03/06/2019</p> <p>7 Page/Line From To</p> <p>8 ____/____</p> <p>9 ____/____</p> <p>10 ____/____</p> <p>11 ____/____</p> <p>12 ____/____</p> <p>13 ____/____</p> <p>14 ____/____</p> <p>15 ____/____</p> <p>16 ____/____</p> <p>17 ____/____</p> <p>18 Subscribed and sworn to before</p> <p>19 me this 6th day of March, 2019.</p> <p>20</p> <p>21 _____</p> <p>22 Wang Zhaojie</p> <p>23</p> <p>24</p> <p>25</p>

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT) ) MASTER FILE NO.  
ANTITRUST LITIGATION ) CV-07-5944 JST

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 )

THIS DOCUMENT RELATES TO: )  
 )

ALL INDIRECT PURCHASER ACTIONS )  
ALL DIRECT PURCHASER ACTIONS )

)  
DEFENDANTS. )

----- )

VIDEOTAPED DEPOSITION OF LI MIAO  
VOLUME III  
THURSDAY, MARCH 9, 2023  
HONG KONG

FILE NO. SF 5759557

REPORTED BY MARK McCLURE, CRR  
CAL CSR 12203

1 Q. Okay. In any event, the safety standard that 16:43:01  
2 the tube was manufactured to would be reflected in the 16:43:08  
3 model number? 16:43:12

4 A. Yes. 16:43:29

5 Q. I believe, yesterday, you referred to 16:43:32  
6 something called the reinforcement band, is that right? 16:43:36

7 A. What did you say? 16:43:58

8 Q. Do you recall -- strike that. 16:44:02

9 Is there something called a reinforcement band 16:44:05  
10 that's part of the manufacturing process of the tube? 16:44:08

11 A. It's called explosion-prevention band. 16:44:28

12 Q. Is that something that a customer would 16:44:33  
13 specify, also? 16:44:36

14 A. The structure, the type and the manufacturing 16:44:37  
15 processes regarding the explosion-prevention band are 16:45:00  
16 very closely related to the safety standards. 16:45:05

17 Q. In your role as the plant chief, did you 16:45:26  
18 communicate with Irico's customers? 16:45:34

19 A. We need to communicate with the users 16:45:35  
20 regarding how to match the circuit with the tube when 16:46:03  
21 they use our products. Also, we provide after-sales 16:46:08  
22 services to our users after they purchase our products. 16:46:35

23 Q. What type of communications would you have 16:46:45  
24 with customers before you manufactured a tube for them? 16:46:49

25 A. It's mainly the discussions regarding how to 16:46:55

1 match the circuitry with a certain tube. 16:47:13

2 Q. And then, was that part of your responsibility 16:47:18

3 as the plant chief, to speak with the customers? 16:47:22

4 A. Generally speaking, I would not handle that 16:47:27

5 directly. I have engineers who would communicate with 16:47:48

6 the customers regarding the design and providing 16:48:08

7 services. 16:48:12

8 Q. Okay. Would any other category of employee, 16:48:14

9 other than engineers, communicate with customers? 16:48:21

10 MR. CARTER: Object to form. 16:48:34

11 THE WITNESS: We would also send people to 16:48:42

12 provide guidance to the users as to the way to operate 16:49:13

13 our products after they started to use our products. 16:49:16

14 But that's only for the time when they just start to use 16:49:32

15 the products. After they have used the product for a 16:49:37

16 while, we will not provide such guidance anymore. 16:49:40

17 BY MR. BIRKHAUSER: 16:49:40

18 Q. What customers do you remember purchasing 16:49:47

19 Irico tubes while you were in Plant No. 1? 16:49:51

20 A. Almost all domestic TV makers have purchased 16:49:55

21 Irico tubes. Regarding the overseas purchasers, based 16:50:21

22 on what I remember, they were from Thailand, Britain, 16:51:05

23 Turkey, and either Russia or Belarus. I don't quite 16:51:10

24 remember. 16:51:20

25 Q. Do you recall any other countries that 16:51:21

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1 purchased tubes manufactured in Plant 1? 16:51:25

2 MR. CARTER: Object to form. 16:51:30

3 THE WITNESS: From the perspective of 16:51:58

4 providing technical communication and customer services, 16:52:01

5 I don't recall other countries. 16:52:06

6 BY MR. BIRKHAEUSER: 16:52:06

7 Q. Do you know about customers that purchased 16:52:09

8 tubes from Irigo manufacturing facilities other than 16:52:16

9 Plant 1? 16:52:23

10 A. I don't understand the question. 16:52:40

11 Q. Do you know about customers that bought tubes 16:52:44

12 manufactured by other Irigo plants, other than Plant 1? 16:52:50

13 A. Plant No. 1 manufactured the tubes, and Irigo 16:53:00

14 also has Plant No. 2 and the factory of Irigo Display 16:53:41

15 Devices. They also manufacture the tubes. So it's 16:53:48

16 quite normal for the customers to purchase the tubes 16:53:51

17 from Plant No. 1, as well as from Plant No. 2 and Irigo 16:53:54

18 Display Devices. 16:54:03

19 It's also normal for the customers to purchase 16:54:03

20 the tubes from other manufacturers inside China, because 16:54:05

21 there are also other tube makers in China. That's also 16:54:09

22 quite normal. 16:54:13

23 Am I misunderstanding your question? 16:54:22

24 Q. Can you tell me the identity of customers 16:54:29

25 purchasing tubes from Plant 2? 16:54:32

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# EXHIBIT 5

1 R. Alexander Saveri (173102)  
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2 Geoffrey C. Rushing (126910)  
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8 *Lead Counsel for Direct Purchaser Plaintiffs*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13  
14 IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

15  
16 This Document Relates To:

17 *ALL DIRECT PURCHASER ACTIONS*

**DIRECT PURCHASER PLAINTIFFS'  
SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO DEFENDANTS IRICO  
GROUP CORP. AND IRICO DISPLAY  
DEVICES CO., LTD.'S SECOND SET  
OF INTERROGATORIES TO DIRECT  
PURCHASER PLAINTIFFS**



PROPOUNDING PARTIES: IRICO GROUP CORP.; IRICO DISPLAY DEVICES CO., LTD.

RESPONDING PARTIES: ARCH ELECTRONICS, INC.; CRAGO, D/B/A DASH COMPUTERS, INC.; MEIJER, INC.; MEIJER DISTRIBUTION, INC.; NATHAN MUCHNICK, INC.; PRINCETON DISPLAY TECHNOLOGIES, INC.; RADIO & TV EQUIPMENT, INC.; STUDIO SPECTRUM, INC.; WETTSTEIN AND SONS, INC. D/B/A WETTSTEIN'S

SET NO.: TWO

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Direct Purchaser Plaintiffs Arch Electronics, Inc.; Crago, d/b/a Dash Computers, Inc.; Meijer, Inc.; Meijer Distribution, Inc.; Nathan Muchnick, Inc.; Princeton Display Technologies, Inc.; Radio & TV Equipment, Inc.; Studio Spectrum, Inc.; and Wettstein and Sons, Inc. d/b/a Wettstein's (together, "Plaintiffs"), by their attorneys, hereby provide the following objections to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.'s Second Set of Interrogatories to Direct Purchaser Plaintiffs (the "Interrogatories") as follows:

**GENERAL OBJECTIONS**

Each of the following objections is incorporated by reference into each of the responses herein:

1. Plaintiffs and their counsel have not completed their (1) investigation of the facts relating to this case, (2) discovery in this action, or (3) preparation for trial. The following responses are therefore based upon information known at this time and are provided without prejudice to Plaintiffs' right to supplement these responses prior to trial or to produce evidence based on subsequently discovered information. Likewise, Plaintiffs' responses are based upon, and therefore limited by, Plaintiffs' present knowledge and recollection, and consequently, Plaintiffs reserve the right to make any changes to these responses if it appears at any time that inadvertent errors or omissions have been made.

2. Plaintiffs generally object to the Interrogatories, including the Instructions and Definitions, on the ground that they purport to enlarge, expand or alter in any way the plain meaning and scope of any interrogatory or to impose any obligations on Plaintiffs' responses in

1 excess of those required by the Federal Rules of Civil Procedure. Plaintiffs will respond to these  
2 Interrogatories in accordance with their understanding of the obligations imposed by the Federal  
3 Rules of Civil Procedure.

4 3. Plaintiffs object to the Interrogatories, including the Instructions and Definitions, on  
5 the ground that the information sought is protected by the attorney-client privilege, the attorney  
6 work product doctrine, the settlement privilege, the mediation privilege or is otherwise privileged  
7 and/or immune from discovery. By responding to these Interrogatories, Plaintiffs do not waive,  
8 intentionally or otherwise, any attorney-client privilege, any settlement privilege, any mediation  
9 privilege, attorney work-product or any other privilege, immunity or other protection that may be  
10 asserted to protect any information from disclosure. Accordingly, any response or production of  
11 documents or disclosure of information inconsistent with the foregoing is wholly inadvertent and  
12 shall not constitute a waiver of any such privilege, immunity or other applicable protection.

13 4. Plaintiffs object to these Interrogatories on the ground that they are compound,  
14 conjunctive or disjunctive.

15 5. Plaintiffs object to the Interrogatories on the ground that they duplicate other  
16 requests, in whole or in part, made in MDL No. 1917 in violation of the Court's Order Re  
17 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs will not  
18 reproduce any material that has been previously produced by another party to MDL No. 1917. *See*  
19 Case Management Order, 2 (Feb. 16, 2021) (ECF No. 5907).

20 6. Plaintiffs object to the Interrogatories on the ground that they are overly broad and  
21 unduly burdensome.

22 7. Plaintiffs object to the Interrogatories on the ground that they are vague, ambiguous,  
23 redundant, harassing or oppressive.

24 8. Plaintiffs object to the Interrogatories on the ground that they require Plaintiffs to  
25 draw legal conclusions.

26 9. Plaintiffs object to the Interrogatories on the ground that the information requested  
27 is neither relevant nor proportional to the needs of the case.

28 10. Plaintiffs object to the Interrogatories on the ground that they, or any portion of

1 them, seek production of any information within the possession, custody, or control of any  
2 Defendant, or of publicly available information such that the information is obtainable from some  
3 other source that is more convenient, less burdensome or less expensive, or the production of the  
4 information will impose undue burden, inconvenience, or expense upon Plaintiffs.

5 11. Plaintiffs reserve the right to modify their allegations based on additional discovery,  
6 additional analysis of existing discovery, discovery not yet completed and/or expert discovery, and  
7 Plaintiffs reserve the right to supplement and/or delete the responses given in light of further  
8 evidence and further analysis of present and subsequently acquired evidence.

9 12. In addition, in accordance with the Federal Rules of Civil Procedure, Plaintiffs  
10 reserve the right to introduce evidence not yet identified herein supporting Plaintiffs' allegations,  
11 including evidence that Plaintiffs expect to further develop through the course of discovery and  
12 expert analysis.

13 13. In providing responses to the Interrogatories, Plaintiffs reserve all objections as to  
14 competency, relevance, materiality, privilege, or admissibility as evidence in any subsequent  
15 proceeding in, or trial of, this or any other action for any purpose whatsoever.

16 14. No incidental or implied admissions are intended in these responses. Plaintiffs'  
17 response to all or any part of any interrogatory should not be taken as an admission that: (a)  
18 Plaintiffs accept or admit the existence of any fact(s) set forth or assumed by the interrogatory; or  
19 (b) Plaintiffs have in their possession, custody or control documents or information responsive to  
20 that interrogatory; or (c) documents or information responsive to that interrogatory exist. Plaintiffs'  
21 response to all or any part of an interrogatory also is not intended to be, and shall not be, a waiver  
22 by Plaintiffs of all or any part of its objection(s) to that interrogatory.

23 15. Plaintiffs object to the Interrogatories on the ground that the cumulative requests by  
24 Defendants and Co-Conspirators in this litigation exceed the permissible number set forth in the  
25 Federal Rules.

26 **OBJECTIONS TO CERTAIN DEFINITIONS AND INSTRUCTIONS**

27 1. Plaintiffs object to the definition of "Complaint" as vague and ambiguous. Plaintiffs  
28 understand this definition to refer to DPPs' Consolidated Amended Complaint at ECF No. 436 and

1 as modified by the Stipulation and Order at ECF No. 996.

2 2. Plaintiffs object to the definition of “Co-Conspirator(s)” as vague and ambiguous.  
3 Paragraphs 81–84 of the Complaint do not enumerate entities. Plaintiffs understand this definition  
4 to refer to persons or entities described in Paragraphs 81–84 of the Complaint.

5 3. Plaintiffs object to the definition of “CRT Product(s)” as vague and ambiguous.  
6 Plaintiffs understand “CRT Product(s)” to have the same meaning as the definition contained in  
7 Paragraph 1 of the Complaint.

8 4. Plaintiffs object to the definition of “Defendant(s)” as vague and ambiguous.  
9 Paragraphs 24–80 of the Complaint include entities other than Defendants. Plaintiffs further object  
10 to the definition of “Defendant(s)” to the extent that it excludes the Mitsubishi and Thomson  
11 Defendants in MDL No. 1917.

12 5. Plaintiffs object to the definition of “Document(s)” on the grounds that it is  
13 overbroad boilerplate that includes irrelevant documents, such as “package inserts or other  
14 information accompanying medications.” Plaintiffs further object to the extent that the definition  
15 exceeds the scope of the Federal Rules of Civil Procedure.

16 6. Plaintiffs object to the definitions of “Identity” and “Identify” (Definitions J and K)  
17 as vague and ambiguous.

18 7. Plaintiffs object to the definition of “Person” as vague and ambiguous as to the  
19 distinction between “means” and “and includes.”

20 8. Plaintiffs object to the definition of “Testimony” as vague and ambiguous as to the  
21 meaning of “any other percipient witness testimony.”

22 9. Plaintiffs object to the definition of “You” and “Your” as vague and ambiguous as it  
23 relies on the undefined, capitalized term “Plaintiffs.” If “Plaintiffs” is intended to mean the parties  
24 identified as “Responding Parties” in the Requests, Plaintiffs object to the definition as overbroad  
25 in seeking discovery of class members who are not currently serving as Named Plaintiffs and have  
26 not served as Class Representatives. Plaintiffs object on the grounds that this definition seeks the  
27 production of documents outside Plaintiffs’ possession, custody, and control. Plaintiffs further  
28 object on the ground that attorneys and agents are included in this definition, and any response or

1 production of documents that may subsequently occur pursuant to these Requests shall not include  
 2 any documents protected by the attorney-client privilege, work product doctrine, the settlement  
 3 privilege, or any other applicable privileges or doctrines. Plaintiffs further object to this definition  
 4 to the extent that it refers to any entity other than Plaintiffs.

5 10. Plaintiffs object to the Instructions to the extent they seek to expand the  
 6 requirements of the Federal Rules of Civil Procedure. Plaintiffs will respond in accordance with the  
 7 Federal Rules.

## 8 **RESPONSES**

### 9 **INTERROGATORY NO. 1**

10 If Your response to any Request for Admission was anything other than an unqualified  
 11 admission, separately for each Request for Admission:

- 12 (a) state the number of the request for admission;
- 13 (b) state all facts upon which You base Your response;
- 14 (c) Identify all Evidence upon which You intend to rely to support Your response; and
- 15 (d) Identify each Person who has knowledge of the facts upon which You base Your  
 16 response.

### 17 **RESPONSE TO INTERROGATORY NO. 1**

18 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 19 also incorporate their objections to this RFA. Plaintiffs object to this interrogatory on the grounds  
 20 that it is compound in that it includes several separate interrogatories in one interrogatory.  
 21 Plaintiffs further object to this interrogatory as well as Defendants Irico Group Corp. and Irico  
 22 Display Devices Co., Ltd.'s First Set of Requests for Admission to Direct Purchaser Plaintiffs  
 23 ("RFAs") to which it refers on the grounds that it is a premature contention interrogatory in seeking  
 24 "all facts" and "all Evidence." Discovery remains open for Plaintiffs until May 17, 2022. In  
 25 addition, the Irico Defendants have failed to make complete discovery regarding the subject matter  
 26 of the RFAs, including their sales during the class period, and their contacts with their alleged  
 27 coconspirators. Plaintiffs further object to this interrogatory on the grounds that the Irico  
 28 Defendants have destroyed or otherwise unlawfully failed to preserve substantial evidence in this

1 case, including without limitation evidence of their U.S. sales and their participation in  
2 conspiratorial meetings and agreements. Plaintiffs further object to this interrogatory on the  
3 grounds that it is overbroad in seeking “each Person” with knowledge of the facts. Plaintiffs further  
4 object on the grounds that this interrogatory requires Plaintiffs to consult multiple documents in  
5 order to understand the question. Plaintiffs further object to this interrogatory on the grounds that  
6 the definition of “Evidence From Other Parties” in the RFAs is vague, ambiguous, and misleading,  
7 including in that the Irico Defendants have produced documents it obtained or contends it obtained  
8 from other parties, including related parties it contends are separate entities; and that it depends  
9 on/requires the resolution of disputed issues. *See, e.g.,* Direct Purchaser Pls.’ Opp. to the Irico  
10 Defs.’ Am. Mots. to Dismiss Claims of Direct Purchaser Pls. for Lack of Subject Matter  
11 Jurisdiction at 12–14 (ECF No. 5640) (Apr. 1, 2019). Plaintiffs further object to this interrogatory  
12 on the grounds that the definition of “Evidence From Other Parties” in the RFAs exceeds the scope  
13 of Rule 36(a)(1) of the Federal Rules of Civil Procedure. Plaintiffs incorporate by this reference all  
14 objections made in their response to the RFAs served herewith.

15 Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

16 *REQUEST FOR ADMISSION NO. 1: Admit that You have no Evidence From Other Parties that*  
17 *Irico attended any Glass Meetings as defined in Paragraph 141 of the Complaint.*

18 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
19 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
20 ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading,  
21 including that the Irico Defendants have produced documents it obtained or contends it obtained  
22 from other parties, including related parties it contends are separate entities; and that it depends  
23 on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory on the  
24 ground that the term “Glass Meetings as defined in Paragraph 141 of the Complaint” is vague,  
25 ambiguous and misleading because “Glass Meetings” are not “defined” in paragraph 141; rather  
26 the Complaint alleges that some group meetings “became known as Glass Meetings” and describes  
27 those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g.,* ¶¶ 140,  
28 142–175). Plaintiffs further object to this Interrogatory on the ground that it duplicates other

1 requests, in whole or in part, made in MDL No. 1917, in violation of the Court's Order Re  
2 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to  
3 this Interrogatory as improperly seeking, in contravention of well-established legal principles, to  
4 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
5 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
6 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
7 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) ("If  
8 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not  
9 appropriate, still less is it appropriate in discovery."), and improperly seeking "to carve the alleged  
10 conspiracy into a number of mini-conspiracies." Order Denying Defendants' Motions for Partial  
11 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
12 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

13 Without waiving the foregoing objections, Plaintiffs respond as follows:

14 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
15 the conspirators including group meetings of conspirators, some of which were referred to as  
16 "Glass Meetings," bilateral meetings between two conspirators, as well as email, telephone and  
17 other communications between conspirators. While discovery is continuing and Plaintiffs expect to  
18 discover additional conspiratorial contacts, the Irico Defendants participated in over one hundred  
19 conspiratorial contacts including glass, group and bilateral meetings, telephone and email  
20 communications, and other contacts with its coconspirators.

21 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
22 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
23 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
24 the Irico Defendants with various documentation (including meeting notes produced by other  
25 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
26 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
27 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
28 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both



1 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
 2 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
 3 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
 4 participants, among other things, exchanged competitively sensitive information including, e.g.,  
 5 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
 6 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
 7 and compliance with previous agreements; discussed anticipated future market conditions; and  
 8 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
 9 Meetings."

10 Plaintiffs direct the Irico Defendants to the following documents: CHU00030661,  
 11 CHU00030665, CHU00030679, CHU00030684, CHU00030688, CHU00016621, CHU00016622,  
 12 CHU00030692, CHU00030695, CHU00030705, CHU00030734, CHU00030752, SDCRT-  
 13 0086599, CHU00030777, CHU00029050, CHU00030797, SDCRT-0086672, CHU00030819,  
 14 CHU00030823, CHU00030827, CHU00030843, SDCRT-0086698, CHU00029046,  
 15 CHU00030881, CHU00030941, CHU00030946, CHU00030953, CHU00030973, CHU00030992,  
 16 CHU00031002, CHU00031018, CHU00029110, CHU00031032, CHU00031040, CHU00031044,  
 17 CHU00031070, CHU00031088, CHU00031092, CHU00031107, CHU00031113, SDCRT-  
 18 0087340, SDCRT-0087694, SDCRT-0087700, SDCRT-0006674, BMCC-CRT000142063,  
 19 SDCRT-0090225, SDCRT-0090233, BMCC-CRT000540532, SDCRT-0091409, SDCRT-  
 20 0091569, SDCRT-0091573, SDCRT-0091584, SDCRT-0091589, SDCRT-0091980, SDCRT-  
 21 0091925, SDCRT-0091942, SDCRT-0091950, CHU00725770, SDCRT-0091957, CHU00102751,  
 22 CHU00102752, CHU00102863, CHU00102864, CHU00447509, CHU00447510, BMCC-  
 23 CRT000105586, SDCRT-0105131, CHU00029131, CHU00029138, IRI-CRT-00024212 to 15.

24 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

25 Plaintiffs believe the following individuals have knowledge relating to the foregoing:

26 All attendees identified in any of the meetings identified in the Binder Documents or the  
 27 other documents identified above; all Irico individuals previously identified in any discovery  
 28 response relating to contacts with competitors and co-conspirators.



1 *REQUEST NO. 2: Admit that You have no Evidence From Other Parties that Irico attended any*  
 2 *Glass Meetings as defined in Paragraph 32 of the Johnson Report.*

3 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 4 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
 5 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
 6 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
 7 obtained from other parties, including related parties it contends are separate entities; and that it  
 8 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
 9 on the ground that the term “Glass Meeting as defined in Paragraph 32 of the Johnson Report” is  
 10 vague, ambiguous and misleading because “Glass Meetings” are not “defined” there; rather the  
 11 Johnson Report describes “Glass Meetings” in several other paragraphs, as well (*see, e.g., ¶¶ 33–*  
 12 *51, 74*). Plaintiffs further object to this Interrogatory on the ground that it duplicates other requests,  
 13 in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and  
 14 Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this  
 15 Interrogatory as improperly seeking, in contravention of well-established legal principles, to  
 16 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
 17 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
 18 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
 19 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
 20 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
 21 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
 22 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
 23 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
 24 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

25 Without waiving the foregoing objections, Plaintiffs respond as follows:

26 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
 27 the conspirators including group meetings of conspirators, some of which were referred to as  
 28 “Glass Meetings,” bilateral meetings between two conspirators, as well as email, telephone and

1 other communications between conspirators. While discovery is continuing and Plaintiffs expect to  
2 discover additional conspiratorial contacts, the Irico Defendants participated in over one hundred  
3 conspiratorial contacts including glass, group and bilateral meetings, telephone and email  
4 communications, and other contacts with its coconspirators.

5 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
6 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
7 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
8 the Irico Defendants with various documentation (including meeting notes produced by other  
9 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
10 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
11 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
12 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
13 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
14 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
15 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
16 participants, among other things, exchanged competitively sensitive information including, e.g.,  
17 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
18 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
19 and compliance with previous agreements; discussed anticipated future market conditions; and  
20 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
21 Meetings."

22 Plaintiffs direct the Irico Defendants to the following documents: CHU00030661,  
23 CHU00030665, CHU00030679, CHU00030684, CHU00030688, CHU00016621, CHU00016622,  
24 CHU00030692, CHU00030695, CHU00030705, CHU00030734, CHU00030752, SDCRT-  
25 0086599, CHU00030777, CHU00029050, CHU00030797, SDCRT-0086672, CHU00030819,  
26 CHU00030823, CHU00030827, CHU00030843, SDCRT-0086698, CHU00029046,  
27 CHU00030881, CHU00030941, CHU00030946, CHU00030953, CHU00030973, CHU00030992,  
28 CHU00031002, CHU00031018, CHU00029110, CHU00031032, CHU00031040, CHU00031044,

1 CHU00031070, CHU00031088, CHU00031092, CHU00031107, CHU00031113, SDCRT-  
 2 0087340, SDCRT-0087694, SDCRT-0087700, SDCRT-0006674, BMCC-CRT000142063,  
 3 SDCRT-0090225, SDCRT-0090233, BMCC-CRT000540532, SDCRT-0091409, SDCRT-  
 4 0091569, SDCRT-0091573, SDCRT-0091584, SDCRT-0091589, SDCRT-0091980, SDCRT-  
 5 0091925, SDCRT-0091942, SDCRT-0091950, CHU00725770, SDCRT-0091957, CHU00102751,  
 6 CHU00102752, CHU00102863, CHU00102864, CHU00447509, CHU00447510, BMCC-  
 7 CRT000105586, SDCRT-0105131, CHU00029131, CHU00029138, IRI-CRT-00024212 to 15.

8 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

9 Plaintiffs believe the following individuals have knowledge relating to the foregoing:

10 All attendees identified in any of the meetings identified in the Binder Documents or the  
 11 other documents identified above; all Irico individuals previously identified in any discovery  
 12 response relating to contacts with competitors and co-conspirators.

13  
 14 *REQUEST NO. 3: Admit that You have no Evidence From Other Parties that Irico attended any*  
 15 *Green Meetings as defined in Paragraph 141 of the Complaint.*

16 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 17 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
 18 ground that the term "Evidence From Other Parties" in the RFAs is vague, ambiguous, and  
 19 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
 20 obtained from other parties, including related parties it contends are separate entities; and that it  
 21 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
 22 on the ground that the term "Green Meetings as defined in Paragraph 141 of the Complaint" is  
 23 vague, ambiguous and misleading because "Green Meetings" are not "defined" in paragraph 141;  
 24 rather the Complaint and describes those meetings in various paragraphs in the Complaint,  
 25 including paragraph 141 (*see, e.g., ¶¶ 140, 142–175*). Plaintiffs further object to this Interrogatory  
 26 on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
 27 violation of the Court's Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
 28 No. 1128). Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of

1 well-established legal principles, to dismember the overall conspiracy in which Irico participated to  
 2 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
 3 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
 4 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
 5 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
 6 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
 7 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
 8 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
 9 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

10 Without waiving the foregoing objections, Plaintiffs respond as follows:

11 See Plaintiffs’ responses for RFAs Nos. 1 and 2, *supra*.

12 Plaintiffs direct the Irico Defendants to the following documents: TSA-CRT00156567,  
 13 TSA-CRT00156568.

14  
 15 *REQUEST NO. 4: Admit that You have no Evidence From Other Parties that Irico attended any*  
 16 *Green Meetings as defined in Paragraph 37 of the Johnson Report.*

17 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 18 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
 19 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
 20 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
 21 obtained from other parties, including related parties it contends are separate entities; and that it  
 22 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
 23 on the ground that the term “Green Meeting as defined in Paragraph 37 of the Johnson Report” is  
 24 vague, ambiguous and misleading because “Green Meetings” are not “defined” there. Plaintiffs  
 25 further object to this Interrogatory on the ground that it duplicates other requests, in whole or in  
 26 part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case  
 27 Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Interrogatory  
 28 as improperly seeking, in contravention of well-established legal principles, to dismember the

1 overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it  
2 as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel  
3 Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT)*  
4 *Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an  
5 alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it  
6 appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number  
7 of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment  
8 Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No.  
9 1827 (Nov. 4, 2011) (ECF No. 4097).

10 Without waiving the foregoing objections, Plaintiffs respond as follows:

11 See Plaintiffs’ responses for RFAs Nos. 1 and 2, *supra*.

12 Plaintiffs direct the Irico Defendants to the following documents: TSA-CRT00156567,  
13 TSA-CRT00156568.

14  
15 *REQUEST NO. 5: Admit that You have no Evidence From Other Parties that Irico attended any*  
16 *Top Meetings as defined in Paragraph 141 of the Complaint.*

17 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
18 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
19 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
20 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
21 obtained from other parties, including related parties it contends are separate entities; and that it  
22 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
23 on the ground that the term “Top Meetings as defined in Paragraph 141 of the Complaint” is vague,  
24 ambiguous and misleading because “Top Meetings” are not “defined” in paragraph 141; rather the  
25 Complaint alleges that some group meetings “became known as Glass Meetings” and describes  
26 those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g., ¶¶* 140,  
27 142–175). Plaintiffs further object to this Interrogatory on the ground that it duplicates other  
28 requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re

1 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to  
2 this Interrogatory as improperly seeking, in contravention of well-established legal principles, to  
3 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
4 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
5 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
6 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
7 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
8 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
9 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
10 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
11 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

12 Without waiving the foregoing objections, Plaintiffs respond as follows:

13 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
14 the conspirators including group meetings of conspirators, some of which were referred to as  
15 “Glass Meetings,” including “Top Meetings,” bilateral meetings between two conspirators, as well  
16 as email, telephone and other communications between conspirators. While discovery is continuing  
17 and Plaintiffs expect to discover additional conspiratorial contacts, the Irico Defendants  
18 participated in over one hundred conspiratorial contacts including glass, group and bilateral  
19 meetings, telephone and email communications, and other contacts with its coconspirators.

20 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
21 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
22 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
23 the Irico Defendants with various documentation (including meeting notes produced by other  
24 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
25 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
26 attendance on the Irico Defendants’ behalf at “many, many” competitor meetings, and admitting  
27 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
28 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group

1 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
2 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
3 participants, among other things, exchanged competitively sensitive information including, e.g.,  
4 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
5 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
6 and compliance with previous agreements; discussed anticipated future market conditions; and  
7 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
8 Meetings."

9 Plaintiffs direct the Irico Defendants to the following documents: CHU00030688,  
10 CHU00016621, CHU00016622, SDCRT-0087340, SDCRT-0090225, BMCC-CRT000540532,  
11 SDCRT-0091569, SDCRT-0091589, SDCRT-0091980, SDCRT-0091925, SDCRT-0091950,  
12 CHU00102751, CHU00102752, CHU00102863, CHU00102864, CHU00447509, CHU00447510,  
13 IRI-CRT-00024212 to 15.

14 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

15 Plaintiffs believe the following individuals have knowledge relating to the foregoing:  
16 All attendees identified in any of the meetings identified in the Binder Documents or the other  
17 documents identified above; all Irico individuals previously identified in any discovery response  
18 relating to contacts with competitors and co-conspirators.

19  
20 *REQUEST NO. 6: Admit that You have no Evidence From Other Parties that Irico attended any*  
21 *Top Meetings as defined in Paragraph 32 of the Johnson Report.*

22 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
23 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
24 ground that the term "Evidence From Other Parties" in the RFAs is vague, ambiguous, and  
25 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
26 obtained from other parties, including related parties it contends are separate entities; and that it  
27 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
28 on the ground that the term "Top Meetings as defined in Paragraph 32 of the Johnson Report" is



1 vague, ambiguous and misleading because “Glass Meetings” including “Top Meetings” are not  
2 “defined” there; rather the Johnson Report describes “Glass Meetings” including “Top Meetings”  
3 in several other paragraphs, as well (*see, e.g.*, ¶¶ 33–51, 74). Plaintiffs further object to this  
4 Interrogatory on the ground that it duplicates other requests, in whole or in part, made in MDL No.  
5 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2,  
6 2012) (ECF No. 1128). Plaintiffs also object to this Interrogatory as improperly seeking, in  
7 contravention of well-established legal principles, to dismember the overall conspiracy in which  
8 Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting  
9 Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories  
10 by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917  
11 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on  
12 summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and  
13 improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order  
14 Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity  
15 at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No.  
16 4097).

17 Without waiving the foregoing objections, Plaintiffs respond as follows:

18 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
19 the conspirators including group meetings of conspirators, some of which were referred to as  
20 “Glass Meetings,” including “Top Meetings,” bilateral meetings between two conspirators, as well  
21 as email, telephone and other communications between conspirators. While discovery is continuing  
22 and Plaintiffs expect to discover additional conspiratorial contacts, the Irico Defendants  
23 participated in over one hundred conspiratorial contacts including glass, group and bilateral  
24 meetings, telephone and email communications, and other contacts with its coconspirators.

25 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
26 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
27 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
28 the Irico Defendants with various documentation (including meeting notes produced by other



1 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
2 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
3 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
4 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
5 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
6 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
7 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
8 participants, among other things, exchanged competitively sensitive information including, e.g.,  
9 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
10 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
11 and compliance with previous agreements; discussed anticipated future market conditions; and  
12 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
13 Meetings."

14 Plaintiffs direct the Irico Defendants to the following documents: CHU00030688,  
15 CHU00016621, CHU00016622, SDCRT-0087340, SDCRT-0090225, BMCC-CRT000540532,  
16 SDCRT-0091569, SDCRT-0091589, SDCRT-0091980, SDCRT-0091925, SDCRT-0091950,  
17 CHU00102751, CHU00102752, CHU00102863, CHU00102864, CHU00447509, CHU00447510,  
18 IRI-CRT-00024212 to 15.

19 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

20 Plaintiffs believe the following individuals have knowledge relating to the foregoing:  
21 All attendees identified in any of the meetings identified in the Binder Documents or the other  
22 documents identified above; all Irico individuals previously identified in any discovery response  
23 relating to contacts with competitors and co-conspirators.

24  
25 *REQUEST NO. 7: Admit that You have no Evidence From Other Parties that Irico attended any*  
26 *Management Meetings as defined in Paragraph 141 of the Complaint.*

27 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
28 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the

1 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
2 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
3 obtained from other parties, including related parties it contends are separate entities; and that it  
4 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
5 on the ground that the term “Management Meetings as defined in Paragraph 141 of the Complaint”  
6 is vague, ambiguous and misleading because “Management Meetings” are not “defined” in  
7 paragraph 141; rather the Complaint alleges that some group meetings “became known as Glass  
8 Meetings” and describes those meetings in various paragraphs in the Complaint, including  
9 paragraph 141 (*see, e.g.*, ¶¶ 140, 142–175). Plaintiffs further object to this Interrogatory on the  
10 ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of  
11 the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128).  
12 Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of well-  
13 established legal principles, to dismember the overall conspiracy in which Irico participated to  
14 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
15 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
16 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
17 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
18 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
19 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
20 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
21 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

22 Without waiving the foregoing objections, Plaintiffs respond as follows:

23 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
24 the conspirators including group meetings of conspirators, some of which were referred to as  
25 “Glass Meetings,” including “Management Meetings,” bilateral meetings between two  
26 conspirators, as well as email, telephone and other communications between conspirators. While  
27 discovery is continuing and Plaintiffs expect to discover additional conspiratorial contacts, the Irico  
28 Defendants participated in over one hundred conspiratorial contacts including glass, group and

1 bilateral meetings, telephone and email communications, and other contacts with its coconspirators.

2 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
3 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
4 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
5 the Irico Defendants with various documentation (including meeting notes produced by other  
6 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
7 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
8 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
9 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
10 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
11 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
12 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
13 participants, among other things, exchanged competitively sensitive information including, e.g.,  
14 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
15 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
16 and compliance with previous agreements; discussed anticipated future market conditions; and  
17 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
18 Meetings."

19 Plaintiffs direct the Irico Defendants to the following documents: CHU00030665,  
20 CHU00030679, CHU00030684, CHU00030692, CHU00030695, CHU00030705, CHU00030752,  
21 SDCRT-0086599, CHU00029050, CHU00030797, SDCRT-0086672, CHU00030819,  
22 CHU00030823, CHU00030827, CHU00030843, SDCRT-0086698, CHU00029046,  
23 CHU00030941, CHU00030946, CHU00030953, CHU00030973, CHU00031018, CHU00029110,  
24 CHU00031032, CHU00031070, CHU00031088, CHU00031092, CHU00031113, SDCRT-  
25 0087694M, SDCRT-0087700, SDCRT-0006674, BMCC-CRT000142063, SDCRT-0091409,  
26 SDCRT-0091573, SDCRT-0091584, SDCRT-0091942, SDCRT-0091957, BMCC-  
27 CRT000105586, SDCRT-0105131, CHU00029131, CHU00029138, IRI-CRT-00024212 to 15.

28 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

1 Plaintiffs believe the following individuals have knowledge relating to the foregoing:  
2 All attendees identified in any of the meetings identified in the Binder Documents or the other  
3 documents identified above; all Irico individuals previously identified in any discovery response  
4 relating to contacts with competitors and co-conspirators.

5  
6 *REQUEST NO. 8: Admit that You have no Evidence From Other Parties that Irico attended any*  
7 *Management Meetings as defined in Paragraph 32 of the Johnson Report.*

8 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
9 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
10 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
11 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
12 obtained from other parties, including related parties it contends are separate entities; and that it  
13 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
14 on the ground that the term “Management Meetings as defined in Paragraph 32 of the Johnson  
15 Report” is vague, ambiguous and misleading because “Glass Meetings” including “Management  
16 Meetings” are not “defined” there; rather the Johnson Report describes “Glass Meetings” including  
17 “Management Meetings” in several other paragraphs, as well (*see, e.g., ¶¶ 33–51, 74*). Plaintiffs  
18 further object to this Interrogatory on the ground that it duplicates other requests, in whole or in  
19 part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case  
20 Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Interrogatory  
21 as improperly seeking, in contravention of well-established legal principles, to dismember the  
22 overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it  
23 as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel  
24 Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT)*  
25 *Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an  
26 alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it  
27 appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number  
28 of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment

1 Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No.  
2 1827 (Nov. 4, 2011) (ECF No. 4097).

3 Without waiving the foregoing objections, Plaintiffs respond as follows:

4 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
5 the conspirators including group meetings of conspirators, some of which were referred to as  
6 “Glass Meetings,” including “Management Meetings,” bilateral meetings between two  
7 conspirators, as well as email, telephone and other communications between conspirators. While  
8 discovery is continuing and Plaintiffs expect to discover additional conspiratorial contacts, the Irico  
9 Defendants participated in over one hundred conspiratorial contacts including glass, group and  
10 bilateral meetings, telephone and email communications, and other contacts with its coconspirators.

11 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
12 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
13 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
14 the Irico Defendants with various documentation (including meeting notes produced by other  
15 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
16 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
17 attendance on the Irico Defendants’ behalf at “many, many” competitor meetings, and admitting  
18 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
19 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
20 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
21 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
22 participants, among other things, exchanged competitively sensitive information including, e.g.,  
23 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
24 shares, customer allocation, production levels and other matters; discussed co-conspirator’s sales  
25 and compliance with previous agreements; discussed anticipated future market conditions; and  
26 discussed pretexts to be used to justify price increase and thus would have been considered “Glass  
27 Meetings.”

28 Plaintiffs direct the Irico Defendants to the following documents: CHU00030665,

CHU00030679, CHU00030684, CHU00030692, CHU00030695, CHU00030705, CHU00030752, SDCRT-0086599, CHU00029050, CHU00030797, SDCRT-0086672, CHU00030819, CHU00030823, CHU00030827, CHU00030843, SDCRT-0086698, CHU00029046, CHU00030941, CHU00030946, CHU00030953, CHU00030973, CHU00031018, CHU00029110, CHU00031032, CHU00031070, CHU00031088, CHU00031092, CHU00031113, SDCRT-0087694M, SDCRT-0087700, SDCRT-0006674, BMCC-CRT000142063, SDCRT-0091409, SDCRT-0091573, SDCRT-0091584, SDCRT-0091942, SDCRT-0091957, BMCC-CRT000105586, SDCRT-0105131, CHU00029131, CHU00029138, IRI-CRT-00024212 to 15.

See also Plaintiffs' response to Interrogatory No. 3, *infra*.

Plaintiffs believe the following individuals have knowledge relating to the foregoing: All attendees identified in any of the meetings identified in the Binder Documents or the other documents identified above; all Irico individuals previously identified in any discovery response relating to contacts with competitors and co-conspirators.

*REQUEST NO. 9: Admit that You have no Evidence From Other Parties that Irico attended any Working Level Meetings as defined in Paragraph 141 of the Complaint.*

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the ground that the term "Evidence From Other Parties" in the RFAs is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory on the ground that the term "Working Level Meetings as defined in Paragraph 141 of the Complaint" is vague, ambiguous and misleading because "Working Level Meetings" are not "defined" in paragraph 141; rather the Complaint alleges that some group meetings "became known as Glass Meetings" and describes those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g., ¶¶ 140, 142–175*). Plaintiffs further object to this Interrogatory on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in

1 violation of the Court's Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
2 No. 1128). Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of  
3 well-established legal principles, to dismember the overall conspiracy in which Irico participated to  
4 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
5 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
6 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
7 2014) (ECF No. 2747) ("If 'compartmentalizing' an alleged conspiracy at trial or on summary  
8 judgment motion is not appropriate, still less is it appropriate in discovery."), and improperly  
9 seeking "to carve the alleged conspiracy into a number of mini-conspiracies." Order Denying  
10 Defendants' Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
11 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

12 Without waiving the foregoing objections, Plaintiffs respond as follows:

13 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
14 the conspirators including group meetings of conspirators, some of which were referred to as  
15 "Glass Meetings," including "Working Level Meetings," bilateral meetings between two  
16 conspirators, as well as email, telephone and other communications between conspirators. While  
17 discovery is continuing and Plaintiffs expect to discover additional conspiratorial contacts, the Irico  
18 Defendants participated in over one hundred conspiratorial contacts including glass, group and  
19 bilateral meetings, telephone and email communications, and other contacts with its coconspirators.

20 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
21 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
22 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
23 the Irico Defendants with various documentation (including meeting notes produced by other  
24 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
25 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own  
26 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
27 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
28 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group



1 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
2 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
3 participants, among other things, exchanged competitively sensitive information including, e.g.,  
4 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
5 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
6 and compliance with previous agreements; discussed anticipated future market conditions; and  
7 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
8 Meetings."

9 Plaintiffs direct the Irico Defendants to the following documents: CHU00030661,  
10 CHU00030734, CHU00030777, CHU00030881, CHU00030992, CHU00031002, CHU00031040,  
11 CHU00031044, CHU00031107, SDCRT-0090233, CHU00725770.

12 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

13 Plaintiffs believe the following individuals have knowledge relating to the foregoing:  
14 All attendees identified in any of the meetings identified in the Binder Documents or the other  
15 documents identified above; all Irico individuals previously identified in any discovery response  
16 relating to contacts with competitors and co-conspirators.

17  
18 *REQUEST NO. 10: Admit that You have no Evidence From Other Parties that Irico attended any*  
19 *Working Level Meetings as defined in Paragraph 32 of the Johnson Report.*

20 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
21 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
22 ground that the term "Evidence From Other Parties" in the RFAs is vague, ambiguous, and  
23 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
24 obtained from other parties, including related parties it contends are separate entities; and that it  
25 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
26 on the ground that the term "Working Level Meetings as defined in Paragraph 32 of the Johnson  
27 Report" is vague, ambiguous and misleading because "Glass Meetings" including "Working Level  
28 Meetings" are not "defined" there; rather the Johnson Report describes "Glass Meetings" including



1 “Working Level Meetings” in several other paragraphs, as well (*see, e.g.*, ¶¶ 33–51, 74). Plaintiffs  
2 further object to this Interrogatory on the ground that it duplicates other requests, in whole or in  
3 part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case  
4 Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Interrogatory  
5 as improperly seeking, in contravention of well-established legal principles, to dismember the  
6 overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it  
7 as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel  
8 Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT)*  
9 *Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an  
10 alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it  
11 appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number  
12 of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment  
13 Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No.  
14 1827 (Nov. 4, 2011) (ECF No. 4097).

15 Without waiving the foregoing objections, Plaintiffs respond as follows:

16 Plaintiffs contend that the conspiracy involved, *inter alia*, hundreds of meetings between  
17 the conspirators including group meetings of conspirators, some of which were referred to as  
18 “Glass Meetings,” including “Working Level Meetings,” bilateral meetings between two  
19 conspirators, as well as email, telephone and other communications between conspirators. While  
20 discovery is continuing and Plaintiffs expect to discover additional conspiratorial contacts, the Irico  
21 Defendants participated in over one hundred conspiratorial contacts including glass, group and  
22 bilateral meetings, telephone and email communications, and other contacts with its coconspirators.

23 Plaintiffs have identified and provided to the Irico Defendants (and the Court) voluminous  
24 evidence of their participation in over 100 meetings with their co-conspirators and have provided  
25 extensive information regarding these meetings. In particular, on May 27, 2021, Plaintiffs provided  
26 the Irico Defendants with various documentation (including meeting notes produced by other  
27 Defendants, deposition transcripts (including testimony by admitted conspirators), as well as  
28 testimony given by the Irico Defendants corporate representative Wang Zhaojie admitting his own

1 attendance on the Irico Defendants' behalf at "many, many" competitor meetings, and admitting  
2 that the Irico Defendants often contacted their competitors. The Binder Documents evidence both  
3 bilateral contacts between the Irico Defendants and their co-conspirators, as well as group  
4 meetings, many of which were formal, pre-arranged and regular group meetings with its co-  
5 conspirators, including Chunghwa, Samsung SDI, LG, Philips, LPD, and Panasonic, at which the  
6 participants, among other things, exchanged competitively sensitive information including, e.g.,  
7 information on inventories, production, sales and exports; agreed upon pricing guidelines, market  
8 shares, customer allocation, production levels and other matters; discussed co-conspirator's sales  
9 and compliance with previous agreements; discussed anticipated future market conditions; and  
10 discussed pretexts to be used to justify price increase and thus would have been considered "Glass  
11 Meetings."

12 Plaintiffs direct the Irico Defendants to the following documents: CHU00030661,  
13 CHU00030734, CHU00030777, CHU00030881, CHU00030992, CHU00031002, CHU00031040,  
14 CHU00031044, CHU00031107, SDCRT-0090233, CHU00725770.

15 See also Plaintiffs' response to Interrogatory No. 3, *infra*.

16 Plaintiffs believe the following individuals have knowledge relating to the foregoing:  
17 All attendees identified in any of the meetings identified in the Binder Documents or the other  
18 documents identified above; all Irico individuals previously identified in any discovery response  
19 relating to contacts with competitors and co-conspirators.

20  
21 *REQUEST NO. 11: Admit that You have no Evidence From Other Parties of any meeting between*  
22 *Irico and a Defendant or Co-Conspirator prior to July 31, 1998.*

23 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
24 also incorporate their objections to this RFA. Plaintiffs further object to the term "meeting" as  
25 vague and ambiguous to the extent it does not include telephone calls, emails or other contacts or  
26 means of communication. Plaintiffs further object to this Interrogatory on the ground that the term  
27 "Evidence From Other Parties" in the RFAs is vague, ambiguous, and misleading, including that  
28 the Irico Defendants have produced documents it obtained or contends it obtained from other

1 parties, including related parties it contends are separate entities; and that it depends on/requires the  
2 resolution of disputed issues. Plaintiffs further object to this Interrogatory on the ground that it  
3 duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court's  
4 Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs  
5 also object to this Interrogatory as improperly seeking, in contravention of well-established legal  
6 principles, to dismember the overall conspiracy in which Irico participated to focus on its separate  
7 parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG  
8 Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re*  
9 *Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) ("If  
10 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not  
11 appropriate, still less is it appropriate in discovery."), and improperly seeking "to carve the alleged  
12 conspiracy into a number of mini-conspiracies." Order Denying Defendants' Motions for Partial  
13 Summary Judgment Regarding Production and Capacity at 1-2, *In re TFT-LCD (Flat Panel)*  
14 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

15 Without waiving the foregoing objections, Plaintiffs respond as follows:

16 See Plaintiffs' responses to Interrogatories Nos. 2 and 3, *infra*, incorporated here by this  
17 reference.

18  
19 *REQUEST NO. 12: Admit that You have no Evidence From Other Parties that Irico attended any*  
20 *meeting with any Defendant or alleged Co-Conspirator outside of China.*

21 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
22 also incorporate their objections to this RFA. Plaintiffs further object to the term "meeting" as  
23 vague and ambiguous to the extent it does not include telephone calls, emails or other contacts or  
24 means of communication. Plaintiffs further object to this Interrogatory on the ground that the term  
25 "Evidence From Other Parties" in the RFAs is vague, ambiguous, and misleading, including that  
26 the Irico Defendants have produced documents it obtained or contends it obtained from other  
27 parties, including related parties it contends are separate entities; and that it depends on/requires the  
28 resolution of disputed issues. Plaintiffs further object to this Interrogatory on the ground that it

1 duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court's  
 2 Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs  
 3 also object to this Interrogatory as improperly seeking, in contravention of well-established legal  
 4 principles, to dismember the overall conspiracy in which Irico participated to focus on its separate  
 5 parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG  
 6 Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re*  
 7 *Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) ("If  
 8 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not  
 9 appropriate, still less is it appropriate in discovery."), and improperly seeking "to carve the alleged  
 10 conspiracy into a number of mini-conspiracies." Order Denying Defendants' Motions for Partial  
 11 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
 12 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

13 Without waiving their objections, Plaintiffs respond as follows:

14 While discovery is not yet complete, and Plaintiffs expect to discover additional  
 15 information regarding the contacts of the Irico Defendants with their competitors, the discovery  
 16 record demonstrates that employees of the Irico Defendants traveled abroad regularly for meetings  
 17 with others including competitors. There is also evidence of international contacts via email,  
 18 telephone, and facsimile transmission.

19 Plaintiffs direct the Irico Defendants to the following documents: IRI-CRT-00024166, IRI-  
 20 CRT-00008316, TCE-CRT 0021183, IRI-CRT-00004769 to 72, IRI-CRT-00008802-8803, IRI-  
 21 CRT-00024205, IRI-CRT-00024259 to 60, TCE-CRT 0022550, TSA-CRT00036206, TCE-CRT  
 22 0021189, TCE-CRT 0022550, TSA-CRT00036954, TCE-CRT 0021189, IRI-CRT-00024328 to  
 23 30, IRI-CRT-00024345 to 47, TSA-CRT00153053, TSA-CRT00187175, IRI-CRT-00024628 to  
 24 32, TSA-CRT00216188, TSA-CRT00216189, TSA-CRT00216190.

25  
 26 *REQUEST NO. 13: Admit that You have no Evidence From Other Parties of direct sales of CRTs*  
 27 *to purchasers in the United States by Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico*  
 28 *Display Devices Co., Ltd.*

1 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 2 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
 3 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
 4 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
 5 obtained from other parties, including related parties it contends are separate entities; and that it  
 6 depends on/requires the resolution of disputed issues. Plaintiffs further object to the phrase “direct  
 7 sales of CRTs to purchasers in the United States by Irico Group Corp., Irico Group Electronics Co.,  
 8 Ltd, or Irico Display Devices Co., Ltd.” as vague, ambiguous and confusing. Plaintiffs further  
 9 object to this Interrogatory on the ground that it is premature because discovery is not yet  
 10 complete. Plaintiffs further object to this Interrogatory on the ground that it duplicates other  
 11 requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re  
 12 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to  
 13 this Interrogatory as improperly seeking, in contravention of well-established legal principles, to  
 14 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
 15 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
 16 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
 17 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
 18 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
 19 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
 20 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
 21 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
 22 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

23  
 24 *REQUEST NO. 14: Admit that You have no Evidence From Other Parties of direct shipments of*  
 25 *CRTs from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd.*  
 26 *to the United States.*

27 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 28 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the

ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to the phrase “direct shipments of CRTs from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd. to the United States” as vague, ambiguous and confusing. Plaintiffs further object to this Interrogatory on the ground that it is premature because discovery is not yet complete. Plaintiffs further object to this Interrogatory on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

*REQUEST NO. 15: Admit that You have no Evidence From Other Parties of direct sales of CRT Products to purchasers in the United States by Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd.*

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it

1 obtained from other parties, including related parties it contends are separate entities; and that it  
2 depends on/requires the resolution of disputed issues. Plaintiffs further object to the phrase “direct  
3 sales of CRT Products to purchasers in the United States by Irico Group Corp., Irico Group  
4 Electronics Co., Ltd, or Irico Display Devices Co., Ltd.” as vague, ambiguous and confusing.  
5 Plaintiffs also object to this Interrogatory on the ground that the term “CRT Products” is vague and  
6 ambiguous. Plaintiffs understand this term to have the same meaning as the definition contained in  
7 Paragraph 1 of the Complaint. Plaintiffs further object to this Interrogatory on the ground that it is  
8 premature because discovery is not yet complete. Plaintiffs further object to this Interrogatory on  
9 the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
10 violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
11 No. 1128). Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of  
12 well-established legal principles, to dismember the overall conspiracy in which Irico participated to  
13 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
14 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
15 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
16 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
17 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
18 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
19 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
20 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

21  
22 *REQUEST NO. 16: Admit that You have no Evidence From Other Parties of direct shipments of*  
23 *CRT Products from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices*  
24 *Co., Ltd. to the United States.*

25 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
26 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
27 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
28 misleading, including that the Irico Defendants have produced documents it obtained or contends it



1 obtained from other parties, including related parties it contends are separate entities; and that it  
2 depends on/requires the resolution of disputed issues. Plaintiffs further object to the phrase “direct  
3 shipments of CRT Products from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico  
4 Display Devices Co., Ltd. to the United States” as vague, ambiguous and confusing. Plaintiffs also  
5 object to this Interrogatory on the ground that the term “CRT Products” is vague and ambiguous.  
6 Plaintiffs understand this term to have the same meaning as the definition contained in Paragraph 1  
7 of the Complaint. Plaintiffs further object to this Interrogatory on the ground that it is premature  
8 because discovery is not yet complete. Plaintiffs further object to this Interrogatory on the ground  
9 that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the  
10 Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128).  
11 Plaintiffs also object to this Interrogatory as improperly seeking, in contravention of well-  
12 established legal principles, to dismember the overall conspiracy in which Irico participated to  
13 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
14 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
15 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
16 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
17 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
18 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
19 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
20 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

21  
22 *REQUEST NO. 17: Admit that You have no Evidence From Other Parties that Irico sold CDTs*  
23 *after 2003.*

24 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
25 also incorporate their objections to this RFA. Plaintiffs further object to this Interrogatory on the  
26 ground that the term “Evidence From Other Parties” in the RFAs is vague, ambiguous, and  
27 misleading, including that the Irico Defendants have produced documents it obtained or contends it  
28 obtained from other parties, including related parties it contends are separate entities; and that it



1 depends on/requires the resolution of disputed issues. Plaintiffs further object to this Interrogatory  
 2 on the ground that the term “CDTs” is undefined and thus is vague and ambiguous. Plaintiffs  
 3 understand this term to have the same meaning as the definition contained in Paragraph 1 of the  
 4 Complaint. Plaintiffs further object to this Interrogatory on the ground that it is premature because  
 5 discovery is not yet complete. Plaintiffs further object to this Interrogatory on the ground that it  
 6 duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s  
 7 Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs  
 8 also object to this Interrogatory as improperly seeking, in contravention of well-established legal  
 9 principles, to dismember the overall conspiracy in which Irico participated to focus on its separate  
 10 parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG  
 11 Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re*  
 12 *Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
 13 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
 14 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
 15 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
 16 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
 17 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

18 Plaintiffs direct the Irico Defendants to the following documents: IRI-CRT-00031184 to 88.

19 Discovery is ongoing for Plaintiffs. Plaintiffs will supplement their responses as appropriate  
 20 under the Federal Rules.

#### 21 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1**

22 Plaintiffs hereby incorporate their previous objections and response to this Interrogatory,  
 23 *supra*. Subject to, and without waiving the foregoing objections, Plaintiffs supplement their  
 24 response as follows:

25 *REQUEST NO. 13: Admit that You have no Evidence From Other Parties of direct sales of CRTs*  
 26 *to purchasers in the United States by Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico*  
 27 *Display Devices Co., Ltd.*

28 Plaintiffs incorporate their General Objections as well as their previous objections to this

1 Interrogatory as though fully set forth herein. Plaintiffs also incorporate their objections to this  
2 RFA.

3 Evidence shows Group and Display sold CRTs in the United States through China National  
4 Electronics Import & Export Caihong Company (“Import-Export”). See documents cited in Direct  
5 Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of Direct Purchaser Pls. for  
6 Lack of Subject Matter Jurisdiction at 12–14 (ECF No. 5640) (Apr. 1, 2019).

7 Evidence shows Import-Export was a part of Group and/or its agent. *See, e.g.*, IRI-CRT-  
8 00002041–105 at 084, 105 (“Master Plan” for restructuring Group’s business, Import-Export’s  
9 “actual assets, personnel, and business all belong[ed] to IRICO Group Corporation”); IRI-CRT-  
10 0000956–1010 at 999; IRI-CRT-00032556–690 at 682; Dep. Ex. 8402. Import-Export is also  
11 located within Group’s premises and its name (“Caihong”) indicates that it is part of Group. See  
12 documents cited in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of  
13 Direct Purchaser Pls. for Lack of Subject Matter Jurisdiction at 13 n.9.

14 Evidence shows that during the Class Period, Import-Export sold more than \$8 million of  
15 CRTs and CRT products to companies based in the United States. *See* IRI-CRT-00003546  
16 (showing total sales to “IRICO USA,” and “G.P.X. Inc.” of \$8.02 million); ECF No. 5640-3 ¶¶ 5–7  
17 (discussing IRI-CRT-00003546); IRI-CRT-00003574–75; IRI-CRT-00025648–97. Export invoices  
18 produced in discovery confirm that Import-Export exported Irico-brand tubes to the United States.  
19 *See, e.g.*, IRI-CRT-00003546; IRI-CRT-00003566–67; IRI-CRT-00003568–69; ECF No. 5640-2,  
20 Ex. 28, at 90:17–20, 91:21–24, 105:3–8; IRI-CRT-00003574–75; IRI-CRT-00003576–77. *See also*  
21 BMCC-CRT000117860–66; BMCC-CRT000121412–26; IRI-CRT-00000810–852; IRI-CRT-  
22 00003544–3645; IRI-CRT-00005654–70; IRI-CRT-00008626–43; IRI-CRT-00029853–69; Irico  
23 Sales Summary (CONFIDENTIAL 2022-06-03).xls (CNEIECC tab).

24 It is likely that additional sales records once existed. ECF No. 5220-10, attachment at 1  
25 (“The Irico Companies have advised that complete historical customer data is not available.”).

26  
27 *REQUEST NO. 14: Admit that You have no Evidence From Other Parties of direct shipments of*  
28 *CRTs from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd.*

1 *to the United States.*

2 Plaintiffs incorporate their General Objections as well as their previous objections to this  
3 Interrogatory as though fully set forth herein. Plaintiffs also incorporate their objections to this  
4 RFA.

5 Evidence shows Group and Display sold CRTs in the United States through China National  
6 Electronics Import & Export Caihong Company (“Import-Export”). See documents cited in Direct  
7 Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of Direct Purchaser Pls. for  
8 Lack of Subject Matter Jurisdiction at 12–14 (ECF No. 5640) (Apr. 1, 2019).

9 Evidence shows Import-Export was a part of Group and/or its agent. *See, e.g.*, IRI-CRT-  
10 00002041–105 at 084, 105 (“Master Plan” for restructuring Group’s business, Import-Export’s  
11 “actual assets, personnel, and business all belong[ed] to IRICO Group Corporation”); IRI-CRT-  
12 0000956–1010 at 999; IRI-CRT-00032556–690 at 682; Dep. Ex. 8402. Import-Export is also  
13 located within Group’s premises and its name (“Caihong”) indicates that it is part of Group. See  
14 documents cited in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of  
15 Direct Purchaser Pls. for Lack of Subject Matter Jurisdiction at 13 n.9.

16 Evidence shows that during the Class Period, Import-Export sold more than \$8 million of  
17 CRTs and CRT products to companies based in the United States. *See* IRI-CRT-00003546  
18 (showing total sales to “IRICO USA,” and “G.P.X. Inc.” of \$8.02 million); ECF No. 5640-3 ¶¶ 5–7  
19 (discussing IRI-CRT-00003546); IRI-CRT-00003574–75; IRI-CRT-00025648–97. Export invoices  
20 produced in discovery confirm that Import-Export exported Irico-brand tubes to the United States.  
21 *See, e.g.*, IRI-CRT-00003546; IRI-CRT-00003566–67; IRI-CRT-00003568–69; ECF No. 5640-2,  
22 Ex. 28, at 90:17–20, 91:21–24, 105:3–8; IRI-CRT-00003574–75; IRI-CRT-00003576–77. *See also*  
23 BMCC-CRT000117860–66; BMCC-CRT000121412–26; IRI-CRT-00000810–852; IRI-CRT-  
24 00003544–3645; IRI-CRT-00005654–70; IRI-CRT-00008626–43; IRI-CRT-00029853–69; Irico  
25 Sales Summary (CONFIDENTIAL 2022-06-03).xls (CNEIECC tab).

26 It is likely that additional sales records once existed. ECF No. 5220-10, attachment at 1  
27 (“The Irico Companies have advised that complete historical customer data is not available.”).  
28

1 *REQUEST NO. 15: Admit that You have no Evidence From Other Parties of direct sales of CRT*  
 2 *Products to purchasers in the United States by Irico Group Corp., Irico Group Electronics Co.,*  
 3 *Ltd, or Irico Display Devices Co., Ltd.*

4 Plaintiffs incorporate their General Objections as well as their previous objections to this  
 5 Interrogatory as though fully set forth herein. Plaintiffs also incorporate their objections to this  
 6 RFA.

7 Evidence shows Group and Display sold CRTs products in the United States through China  
 8 National Electronics Import & Export Caihong Company (“Import-Export”). See documents cited  
 9 in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of Direct Purchaser  
 10 Pls. for Lack of Subject Matter Jurisdiction at 12–14 (ECF No. 5640) (Apr. 1, 2019).

11 Evidence shows Import-Export was a part of Group and/or its agent. *See, e.g.*, IRI-CRT-  
 12 00002041–105 at 084, 105 (“Master Plan” for restructuring Group’s business, Import-Export’s  
 13 “actual assets, personnel, and business all belong[ed] to IRICO Group Corporation”); IRI-CRT-  
 14 0000956–1010 at 999; IRI-CRT-00032556–690 at 682; Dep. Ex. 8402. Import-Export is also  
 15 located within Group’s premises and its name (“Caihong”) indicates that it is part of Group. See  
 16 documents cited in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of  
 17 Direct Purchaser Pls. for Lack of Subject Matter Jurisdiction at 13 n.9.

18 Evidence shows that during the Class Period, Import-Export sold more than \$8 million of  
 19 CRTs and CRT products to companies based in the United States. *See* IRI-CRT-00003546  
 20 (showing total sales to “IRICO USA,” and “G.P.X. Inc.” of \$8.02 million); ECF No. 5640-3 ¶¶ 5–7  
 21 (discussing IRI-CRT-00003546); IRI-CRT-00003574–75; IRI-CRT-00025648–97. Export invoices  
 22 produced in discovery confirm that Import-Export exported Irico-brand tubes to the United States.  
 23 *See, e.g.*, IRI-CRT-00003546; IRI-CRT-00003566–67; IRI-CRT-00003568–69; ECF No. 5640-2,  
 24 Ex. 28, at 90:17–20, 91:21–24, 105:3–8; IRI-CRT-00003574–75; IRI-CRT-00003576–77. *See also*  
 25 BMCC-CRT000117860–66; BMCC-CRT000121412–26; IRI-CRT-00000810–852; IRI-CRT-  
 26 00003544–3645; IRI-CRT-00005654–70; IRI-CRT-00008626–43; IRI-CRT-00029853–69; Irico  
 27 Sales Summary (CONFIDENTIAL 2022-06-03).xls (CNEIECC tab).

28 It is likely that additional sales records once existed. ECF No. 5220-10, attachment at 1

1 (“The Irico Companies have advised that complete historical customer data is not available.”).

2  
3 *REQUEST NO. 16: Admit that You have no Evidence From Other Parties of direct shipments of*  
4 *CRT Products from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices*  
5 *Co., Ltd. to the United States.*

6 Plaintiffs incorporate their General Objections as well as their previous objections to this  
7 Interrogatory as though fully set forth herein. Plaintiffs also incorporate their objections to this  
8 RFA.

9 Evidence shows Group and Display sold CRTs products in the United States through China  
10 National Electronics Import & Export Caihong Company (“Import-Export”). See documents cited  
11 in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of Direct Purchaser  
12 Pls. for Lack of Subject Matter Jurisdiction at 12–14 (ECF No. 5640) (Apr. 1, 2019).

13 Evidence shows Import-Export was a part of Group and/or its agent. *See, e.g.*, IRI-CRT-  
14 00002041–105 at 084, 105 (“Master Plan” for restructuring Group’s business, Import-Export’s  
15 “actual assets, personnel, and business all belong[ed] to IRICO Group Corporation”); IRI-CRT-  
16 0000956–1010 at 999; IRI-CRT-00032556–690 at 682; Dep. Ex. 8402. Import-Export is also  
17 located within Group’s premises and its name (“Caihong”) indicates that it is part of Group. See  
18 documents cited in Direct Purchaser Pls.’ Opp. to the Irico Defs.’ Am. Mots. to Dismiss Claims of  
19 Direct Purchaser Pls. for Lack of Subject Matter Jurisdiction at 13 n.9.

20 Evidence shows that during the Class Period, Import-Export sold more than \$8 million of  
21 CRTs and CRT products to companies based in the United States. *See* IRI-CRT-00003546  
22 (showing total sales to “IRICO USA,” and “G.P.X. Inc.” of \$8.02 million); ECF No. 5640-3 ¶¶ 5–7  
23 (discussing IRI-CRT-00003546); IRI-CRT-00003574–75; IRI-CRT-00025648–97. Export invoices  
24 produced in discovery confirm that Import-Export exported Irico-brand tubes to the United States.  
25 *See, e.g.*, IRI-CRT-00003546; IRI-CRT-00003566–67; IRI-CRT-00003568–69; ECF No. 5640-2,  
26 Ex. 28, at 90:17–20, 91:21–24, 105:3–8; IRI-CRT-00003574–75; IRI-CRT-00003576–77. *See also*  
27 BMCC-CRT000117860–66; BMCC-CRT000121412–26; IRI-CRT-00000810–852; IRI-CRT-  
28 00003544–3645; IRI-CRT-00005654–70; IRI-CRT-00008626–43; IRI-CRT-00029853–69; Irico

1 Sales Summary (CONFIDENTIAL 2022-06-03).xls (CNEIECC tab).

2 It is likely that additional sales records once existed. ECF No. 5220-10, attachment at 1  
3 (“The Irico Companies have advised that complete historical customer data is not available.”).

4  
5 DATED: September 1, 2022

By: /s/ R. Alexander Saveri

6 R. Alexander Saveri  
7 Geoffrey C. Rushing  
8 Matthew D. Heaphy  
9 SAVERI & SAVERI, INC.  
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# EXHIBIT 6

## Filed Under Seal

# EXHIBIT 7





June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range: CHU00030679E - CHU00030683E.

A handwritten signature in black ink, which appears to read 'Abraham I. Holczer', is written over a horizontal line.

Abraham I. Holczer

Project Manager

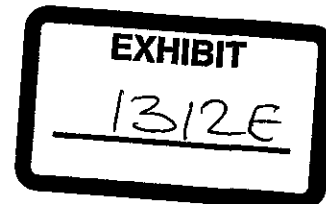
Park

Case

#

29567

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## [TRANSLATION]

Mainland China *CDT Maker* Contact Meeting

[Handwritten:]

Respectfully Submitted to President Peng

Submitted for review

Urgent Document

Please deliver to Mr. Chung-Cheng (Alex) Yeh in Room 2705

*Fm*: Guang-Hui Dai, Total 4 pages.

Date: Oct. 09, 1998

Location: Fuzhou

Meeting: *CPTF* - Senior Manager Jing-Song (Jason) Lu, Section Chief

Attendees: Chung-Cheng (Alex) Yeh, Guang-Hui Dai, Wei-Lie Yu

*PHS* - Zheng-Er Shao, (Huafei) President Jian-Zhong Sheng, (Huafei)  
Manager Bing Ma*SSDD* - Department Manager Myoung-Sik Lee, Zhen Yang*ORION* - Section Chief TAE SIK KONG (*TAE SIK KONG*)*LG* - Section Chief J.B.PARK (*J.B.PARK*)*IRICO (IRICO)* - Vice President Jian-She WeiI. Summary of the Production and Sales Situation/Production Plan for *CDT MAKERS*

- 1) In September 1998, the production and sales situation/production line plan was as follows:

(Chart 1)

Unit: K PCS

Maker	Size	Production, Sales, Inventory of Sept. 98			'98 Q4 Planned Production Volume (SUPPLY)				Planned Production Volume of '99
		Production	Sales	Inventory	October		Planned Production of Nov.	Planned Production of Dec.	
					Planned Production	Planned Sales			
CPTF	14"	210	215	105	150	170	150	150	1800
	15"						30	60	1710
SSDD	14"	180	185	5	150	160	150	150	1800
	15"								
PHS Huafei	14"	180	180	20	120	70-100	120	120	1600
	15"								100(SKD)
BMCC	14"	25	25	25	30		30	30	
ORION	14"		75		50	25-50	40	30	300
	15"		10		30	30	30	15	300
Irico	15"	20	40	0	20		30	40	1000
LG	14"		6		10		10	10	0
	15"		3		10		10	20	360
TTL	14"	595	686	155	510	455-510	500	490	
TTL:	15"	20	53	0	60		100	125	

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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Explanation of major points:

- A) *CPTF*: 9/E, the actual inventory of 14" finished product reached 189K. The accumulated tube inventory reached 113K. However, in order to avoid concerns by all makers about excess inventory, certain inventory figures had been withheld. It was also explained that because of expected changes to the 15" line, it should be possible to digest 14" inventory in Q4. All makers did not question this matter. In 1999, depending on the 14" market situation, it can be expected that *ONE* production *LINE* each for 14" and 15" will be retained.
- *PHS CHALLENGES CPTF* → *PHS*'s Mr. Shao claimed that *CPTM* was heard to have engaged in sales of inferior tubes in the market, and would like clarification of this situation from us. We responded with clear indication that absolutely no such situation exists.
- B) *SSDD* 14" production line's actual production capacity could reach 180 – 200K/M. Based on the production, sales and inventory data from September provided by its marketing department (deliveries to storage: 206.5K; sales: 216K; and inventory: 3.2K), it can clearly be seen that the September production and sales figures provided at the meeting were kept down. With respect to the large size production of 15" and 17", it is expected that in April 1999 and September 1999, Mainland China *TSDD* (Tianjin Samsung)/*SSDD* (Shenzhen Samsung) each plans to construct an additional production line for using in production (due to capital considerations, whether or not *SSDD* will establish a new line or import an old line from Korea has not been confirmed). A decision has not been made as to the sizes to be produced and as to which factory is to make such production. Additionally, *SSDD* has indicated that its domestic and export sales ratio is approximately 1/2 each. Department Manager Lee has also suggested that all makers propose to their headquarters that the price for 15" should be increased a bit more (maintain at least a US\$15 price difference). In addition to profit considerations, this will also avoid hastening the decline of 14"

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II. General Assessment of Demand by Mainland Customers for 14" CDT in Q4 (BY CUSTOMERS)

(Chart 2) Unit: K PCS

Customer	Estimated Demand	CDT Domestic Sales Volume	TTL Demand	Remark
ACER(SZ)	10K(CPTF) 8K(PHS)	2K(PHS)	20K	
AOC	40K(CPTF) 40K(ORION)		80K	Estimates there are 30-40k FOR domestic Sales
ADI	20K(SSDD)		20K	
COMPAL	12K(CPTF)		12K	
EMC	30K(SSDD)		30K	
GVC	10K(SSDD) 10K(ORION)		20K	
IRIC	10K(BMCC) 10K(PHS)		20K	
KFC	8K(SSDD)		8K	
LI-ON	40K(CPTF)		40	
PHS(DG/SZ)	45K(CPTF)	45K(PHS)	90K	Main domestic customer for Huafei is PHS (SZ)
SHAMROCK	10K(CPTF) 6K(SSDD)		16K	
FIC	3K(PHS)		3K	
MAG	2K(SSDD)		2K	
DTS	3K(PHS) 3K(ORION)		6K	
CHINA OTHERS		40K(ORION) 80K(SSDD) 40K(PHS) 10K(BMCC) 6K(LG)	176K	Main customer for SSDD are Beijing Founder Electronic Co and Xococo
Total	320K	223K	543K	

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[Handwritten below chart:] 543 x

Explanation:

According to Chart 1, the total sales volume of 14" in September is 686K. Compared to the September production volume of 595K, there is an over sold phenomenon. Additionally, the estimated sales volume in October was made on the understanding of information regarding current orders as provided by all CDT MAKERS. According to the analysis of estimates of each maker on supply volume and sales volume (Chart 1) and demand according to customers (Chart 2), supply and demand still can basically remain even, which is favorable to a price increase. Additionally, with the exception of SSDD, who from the very beginning had doubts about an increase of their domestic sale price coefficient to 10.4, other makers have generally indicated unanimous determination to increase prices. For this reason, each CDT MAKER should definitely FLW their headquarters, and have full confidence in a price increase. However, SSDD Department Chief Lee has finally been persuaded by Huafei and CPTF to increase its domestic sales price quote coefficient to 10.4, and reached an agreement.

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- *CPTF CHALLENGES SSDD → OVER LOADING* its production capacity greatly, which resulted in a lack of confidence in the domestic sales price at the last meeting (export price multiplied by a coefficient of 10.4). All makers also agreed. In particular, *PHS* claims that its increase in the coefficient from 10 → 10.4 has already been announced to customers. From the very beginning, *SSDD* was not confident in the increased 10.4 coefficient. However, after strong requests from all makers and President Sheng of *Huafei* saying that, even though *BMCC* did not attend the meeting, in previous communications it had already indicated that it would abide by the resolutions from the meeting, Department Manager Lee of *SSDD* reluctantly agreed after great concern.
  - *ORION CHALLENGES SSDD →* Supports its increase of the coefficient for domestic sales price and questions the low domestic price given to *LOCAL* customers by *SSDD* in southern China.
- C) *Huafei*: Although *Huafei* has 2 short *LINES*, because of the unique feature of *PHS*'s system of weekly division, the working weeks for the months of 3/6/9/12 each reach 5 weeks. In September, the production amount could reach 180K. The 15" production plan is to consider transferring 3 *LINES* from the Chubei factory to Mainland China. (Mr. Shao stated that because the production line design is consecutive, if the Chubei factory 15" production facilities are shifted, the 3 *LINES* must be transferred together). However, this plan has not been confirmed. With respect to domestic sales, it is mainly supplied by *PHS(SZ)*. Additionally, it is claimed that *PHS(TWN)* still has a 14" inventory of 10 ~20K *FOR* the small monthly demand of its European customers.
- *CPTF CHALLENGES PHS →* In October, the letter concerning the price increase to *ACER* was never issued following repeated delays. *PHS* claimed that this was because its price quote for *ACER* was not formally confirmed until the middle of the month. Also *MONITOR* customers (especially *IN USA*) are quite sensitive to "price monopolies." Unless customers definitely require a written statement, it should be handled with the utmost caution. However, the resolutions from headquarters will surely be followed. Verbally, all determined to announce the price increase to customers. On the other hand, *CPTF* indicated that *MONITOR* should be allowed to have some time to communicate with its customers regarding the price increases. When the market situation is weak, it is understandable not to confirm the price until the middle of a month. However, it is currently at peak season, and the time when all makers are confirming and stabilizing their prices. *PHS* was asked to improve its mid-month pricing practice.
- D) *ORION*: The September sales figures listed above do not include sales of 50K to *AOC*. In 9/E, the 14" inventory was below 30K. MR. Kong stated that the 15" facilities will be improved in 10/M, and that in the future it will continue to maintain 14" *ONE LINE*, 15" *ONE LINE*, and another *ONE LINE* (75% *FOR* 15", and 25% *FOR* 17"). The production capacity of each line is approximately 160 – 170K/M.

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- *PHS CHALLENGES ORION* → *ORION*'s China offices are grabbing customers to enhance their sales performance. It has been said there was *US\$56* appearing at market price for 15", so clarification regarding whether *A*-tube or *B*-tube has been sold was requested. *ORION* claims that it has not made any sales to dealers, and ensures that there will be no customer overlap among its offices in Mainland China, and that all prices *FLW ORION H.Q.* prices. It staunchly denied such market price exists.
  - *CPTF CHALLENGES ORION* → An explanation was requested as to the disposal method for defective *AOC* tubes. *ORION* replied: The defect rate of 14" in *AOC* averages at about 0.5%. The cost of defective tubes is calculated at 75% of *A* tubes. And using a production rate of 40*K/M* to calculate the amount of *B* tubes the volume should only be 200 *PCS*. Volume should not be large. *ORION* insists that its defect rate is indeed this low; however, the other makers doubt its low defect rate.
  - *SSDD CHALLENGES ORION* → Upon investigation, Shenzhen customer *KTC* (Kangte) and *SRC* each purchased barely-passing tubes from *AOC* (*ORION'S TUBE*) in September, and it was also heard that the *ORION*'s September price for 14" was *US\$43*. There were also claims that even in September *S/T GLARE B+D* tube prices should not be at this market price. *ORION* has staunchly denied that it sold inferior tubes, and that it *OFFERED* a price of *US\$43* in September.
- E) *BMCC*: Basically because it is losing money, although it has not given up on the *CDT* market, it also won't consider selling more (14" production  $\leq 30K$ ). With respect to 15", due to an assessment that it lacks competitive capability, temporarily its production won't be started.
- F) *LG*: Currently only has a half-line 14" production line, with a production capacity of approximately 70~80*K/M*. Internal self-use is 50*K/M*. The remaining 20 *K/M* are sold to Southeast Asia and Mainland China. No consideration is given to the production of 14" in 1999.

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## 3) 1999 CDI Maker Production Plan

(Chart 3)

Units: K PCS

	Q1	Q2	Q3	Q4	Remark
CPT	300-375K/M	300-375K/M	300-375K/M	300-375K/M	2.5 LINES
PHS	130K/M	130K/M	130K/M	130K/M	2 LINES
SSDD	350K/M	350K/M	350K/M	350K/M	2 LINES
ORION	160K/M	160K/M	160K/M	160K/M	1 LINE
LG	40-80K/M	40-80K/M	40-80K/M	40-80K/M	Might discontinue production of 14"
BMCC	30K/M	30K/M	30K/M	30K/M	
TTL	1010-1125K/M	1010-1125K/M	1010-1125K/M	1010-1125K/M	

## Explanation

If the supply of 14" in 1999 is estimated to be 1100K/M, the total annual supply volume will be approximately 13,200K PCS. However, SSDD and PHS all believe that the TTL DEMAND in 1999 (for 14"/15"/17") will be approximately 90,000K PCS. If the 15% estimate of PHS/SSDD for demand of 14" is used, the 1999 annual demand volume will be 13,500K PCS. From the above analysis, it can be expected that in 1999, the supply and demand relationship for 14" CDT will tend to be balanced.

## III. Conclusion

1. Competition between ORION and SSDD for LOCAL customers in southern China is strong, and both parties doubt each other's claims that "domestic sale prices are unreasonable," and the sales behavior regarding "A or B tube." ORION, in addition to strongly denying the sale of B tubes and the behavior of quoting low prices, has also requested that SSDD provide accurate data for investigation and verification. Although SSDD eventually agreed to use 10.4 as the coefficient for the domestic sale price, it still appears to lack confidence in the increase of the domestic sale price.
2. SSDD has requested that all makers propose to their headquarters that the scale of price increase of the 15" be a bit larger, and that a price differential of at least US\$15 should be maintained from 14."
3. Although BMCC did not participate in the meeting, it previously communicated with Huafei that it would abide by the meeting resolution. Huafei's President Sheng is responsible for relaying the agreement of using the coefficient of 10.4 for domestic sale price.
4. According to Q4 of 1998 and 1999's supply and demand situation analysis, generally the supply and demand for 14" will be balanced whether it's in the Mainland China region or the worldwide market. Each CDT MAKER should strictly control production volume, and in particular, should not engage in OVER

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*LOADING* the way *SSDD* did in September, in order to ensure the stability of prices.

5. The next meeting will be convened by Irico. The time and location will be discussed separately.

- End of Report - Submitted for Approval

Submitted by Employee Guang-Hui Dai  
OCT. 11, 1998

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# EXHIBIT 8



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00030684E - CHU00030687E.

A handwritten signature in dark ink, reading 'Abraham I. Holczer'. The signature is fluid and cursive, written over a horizontal line.

Abraham I. Holczer

Project Manager

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## Translation

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王秋

各委員 陳永興  
大陸 CDT MAKER 聯繫會議

吳華 11/3.98

時間：NOV.06, 1998

地點：西安

與會人員：

CPTF：葉俊正課長、戴光輝

PHS：邵正璽業務經理、(華飛)盛建忠總經理、(華飛)馬冰經理

SSDD：李明植部長、楊真

ORION：孔泰植(TAE.SIK.KONG)課長

彩虹 IRICO：魏建社副總、李衛生銷售經理、姚軍營業部副部長、王昭杰

BMCC：黃新文

主辦：彩虹集團公司 主席：PHS 邵正璽

會議內容：

一、各 CDT MAKER 產銷訊息交流

茲將 CRT 廠商產銷訊息交流重點說明如下：各 CDT MAKER'98 年 4Q 產銷及'99 年預計生產量狀況如後附(表一)

- 1) CPTF：與會各家關切 CPTF 15'' CDT 進度。CPTF 稱因 DY 備料供應吃緊，11 月預計生產銷售 30K，12 月預計生產 70K。
- 2) SSDD：天津三星廠 15'' CDT 預計於'99 年 6 月 M/P，但由 SSDD(深圳三星)統籌銷售工作，而 SSDD 則將利用釜山 14'' CDT 線加以修改以進行 17'' CDT 生產，預計'99 年 9 月 M/P。另，天津三星監視器廠因產能受限，'98 年產能約 40K/M，'99 年產能則預計 300K/年(15'' CDT 為主)。此外，MR.李稱 SSDD 上個月 CPT 有獲利，但 CDT 則仍無獲利。
- 3) 華飛：
  - A) 11 月 14'' 銷售訂單差，目前確認的訂單有 40K，11 月以 70K 為目標。主要訂單來源仍以內需(PH 巴西/東莞兩廠為主)。
  - B) 因資金問題 PHS(竹北廠)'99 年 15'' CDT 可能仍不會考慮遷移至大陸，但擴改部份設備在華飛進行 15'' CDT 生產。因此，14'' 11/12 月訂單雖不佳亦全線稼動，目的在積些庫存以因應'99 年可能停線時之供應。而'99 年 14''/15'' 生產規劃可能為 1600K/零 K 或 800K/400K，全俟'99 年初是否改線之決策而定。
  - C) 14'' 10 月份銷售上以內需 PHS(巴西/蘇州)60K 為主；11 月份已確定之訂單 40K 中亦幾乎為 PHS(巴西/東莞)內需，其中東莞廠達 18K；12 月份則據悉 PSH(巴西/東莞)之訂單應會增加，因此在上述 B) 原因下，12 月產銷計畫高於 11 月份數量。另邵'R 稱 PHS15'' CDT 銷售於台商大陸的部份主要為 AOC/EMC，合計約 30K 左右，銷售於 PHS(SZ)則應在 40K 以上。
- 4) IRICO(彩虹集團)：
  - A) 15'' CDT ONE LINE 於今年 3 月始產出，該線最大產能為 60~70K/M，但因主要材料自 TSB 取得不易且價高等因素，9 月停工一個月，於 10 又重新稼動。'98 年預計達 200K/年生產目標，其中 80% 為銷售於彩塵。
  - B) 自日本 TSB CKD 之成本仍比售價高，故賣越多虧越多。惟在採購自主化政策下，主要材料中 DY 已可由其彩虹偏轉廠供應 20K/M，另 FUNNEL 自 12 月始亦可以自製。

## 5) BMCC:

A) 10 月份銷售差，主要銷售對象為菲律賓松下公司，至於 ACER(SZ)則近幾個月均無往來。

B) '99 年 14'/'15' 分別預計生產 80K/400K。其中 14' CDT 預計生產至 2 月份即結束，估計 2 月份春節過後即可完成 15' CDT 之設備改造，產能上仍為 40~50K/M。

6) ORION: 10 月訂單差主要係因大陸近期加強打擊走私後，對杜絕華南一帶以內銷為主之顯示器廠走私進口影響甚大。值此是故，據稱其客戶 9 月份停在香港的貨櫃仍近 14K 尚未提貨。

7) PHS 提供 '98/99 年 14' CDT 大陸地區生產之預測(請參閱附件 1)。<sup>11</sup>'98 年大陸地區廠商生產量估計約 7.405KPCS，'99 年則預計約 5,630KPCS。

'98 年 10~12 月產銷概況/99 年預計生產量 (表一)

單位: K PCS

廠商	尺寸	'98 年 10 月產銷存			'98 年 11 月產銷存		'98 年 12 月產銷存		'99 年計畫量	備註
		生產	銷售	庫存	預計生產	預計銷售	預計生產	預計銷售		
CPTF	14"	210	140	175	60~70	130	60~70	140	1300~1400	
	15"								1600~1800	
SSDD	14"	180	165	20	150~180	160	150~180	160		
	15"		200			200		200		SDD 銷售大陸台商
PHS 華飛	14"	140	120	40	120	40~70	120	100	1600 或 800	
	15"								0 或 400	
BMCC	14"	30	14	25	40	30	40	30		
ORION	14"		10			20		20	300K(未含台商)	
	15"		80			100		70	300K(未含台商)	10 月份 20K FOR 內銷, 60K FOR 台商外銷
IRICO 彩虹	15"	20	20	0	30	30	40	40	600~700K	
LG	14"		4			4		?		
	15"		40			40		?		

## 二、價格檢討

1) ORION 首先反應，因大陸近期在加強打擊走私政策下，對其華南一帶以內銷為主之顯示器廠客戶影響至極。其現今對外報價 14''S/S US\$50，在其客戶相關運輸費用、關稅、及外匯管理局管制等相關因素下，無法與大陸 LOCAL 供應之其他 CRT 廠商相比，客戶根本不接受。

ORION 表示其與 LG 看法一致，盼降低美金報價或提高人民幣計價之係數(目前為 10.4)，否則訂單全無情形下，只好退出 CRT 定期 MEETING。各廠商回應如下：

A) 因與會各家廠商認為調降美金報價已超過與會各廠之地方權限，而因 10 月份第二波 CRT 調漲，大陸 MONITOR 廠商並未充分反應於其 BUYER，因此調高人民幣報價在大陸地區目前亦沒有外在條件可支撐。

B) SSDD MR. 李本提出考慮報價較 ORION 為高，讓出部份內銷客戶於 ORION 繼續進行銷售，但後來因 ORION 主要客戶為廈華/北大方正/長城，MR. 李最後又因在意該群客戶而予以否決自己之建議。

結論：請各廠向總部反應 ORION 的問題，PSH 邵 R 並負責將總部最後之決議通知各廠。

1. 現內銷係  $\times 10.4$  款，綜合稅率約 20%。剛好是 CRT 廠所上交的稅，已完全存在客戶。~~再提高~~再提高不太合理客戶也不會接受。  
2. 降美金報價更會造成市場紊亂，更不可行。



2) IRICO: 與會各家向 IRICO 訂出 15'' 之內/外部交易價底線如下: (BASED ON S/S ITC TYPE)

A) IRICO 對彩皇內部交易價為 (US\$60X10.4=人民幣含稅報價)

B) IRICO 對其他客戶報價則因其品質效率較差且數量有限, 因此以 (US\$62 或 63X10.4=人民幣含稅報價)

3) BMCC:

BMCC 10 月份訂單極差 (14K), 主要客戶為彩皇與方正, 需求各為 10K/M 左右; 但彩皇 10 月亦無下單。針對其主要之兩家客戶, BMCC 坦承 S/S TYPE 以 US\$48X10.0 作為人民幣內銷報價。惟與會各 CDT MAKER 均反對 BMCC 在美金與人民幣核算係數做雙重讓與 (公定人民幣內銷報價應為 US\$50X10.4)。經協議, 各家最終同意 BMCC 在其兩家主要客戶再降低美金報價 US\$1 (亦即以 US\$47 為 BASE), 但須 KEEP 內銷係數 10.4; 另與會各家希望大家稍作部份退讓, 希望能在 AOC 以 US\$48X10.4 作為內銷報價。

結論: **BMCC 在其主要客戶(彩皇/方正)以 US\$47X10.4 報價。但針對在 AOC 以 US\$48X10.4 作為內銷報價, CPTF 則表反對, 並認為目前與 AOC 係以 14''/15''/17'' 搭配供應, 即使 BMCC 用該價格應也不會有訂單。**

4) SSDD:

A) CPTF/PHS 均稱市場上對 SSDD 銷售次管常有雜音。MR. 李則略帶抱怨的回應, 上個月因 PHS 未向其求證且無確切證據逕向總部反應 SSDD 對北京某客戶有次管銷售行為, 因而被其總部老闆質詢。PHS 邵'R 則解釋爾後將多加強平時之聯繫與確認, 並對 PHS 較粗率之反應過程向 MR. 李致歉。

B) CPTF/PHS 均稱市場上常反應 SDD 有 F.O.C. (free of charge) 之聲音, 似乎成為變相降價。MR. 李則稱因其不良管沒有回收, 此乃不良管折讓的作法。

結論: **CPTF/PHS 建議 SSDD 對不良管要回收或與請其工程師將 PIN 剪掉破壞避免其再銷售利用, 另請 SSDD 將正常出貨之數量 INVOICE 與折讓之 INVOICE 分開處理, SSDD 則表同意並請 PHS 提供相關文件作法供參考。**

→ 在該用 replace 才對。因即使 invoice 分開處理也無法區別是否為 rebate.

三、其他

1. 考量 14'' CDT 急速萎縮並為了 CDT 產業健康發展, MS. 李承諾負責聯繫, 整合大陸地區中大型監視器廠商召開整合會議。

2. 14'' 市場上因各家均聽到許多雜音, 認為 4Q 以後可能價格會鬆動。因此, 與會各家達成一致性口徑及共識, 敦促各自業務說法如下: 『價格不可能下跌, 若有超額供給現象則以減產因應。』

3. 下次會議由 BMCC 主辦並于北京召開, 時間: 12/4

1. CPT/PHS/ORION 均對 SSDD 均 challenge 其單開 SSDD 賣管人 FOC 要相降價。但 SSDD 否認並辯稱係不良管補償所致。但無憑不起浪。請 SSDD 自律。

--以上報告--

呈核

2. 99 年 4Q SSDD 在大陸尚有 14''/15''/17'' 各一條。相對競爭優勢增強。

3. ORION 在公中要脅。若內銷係數不調高。職 戴光輝 敬呈

NOV. 8, 1998

則要調降美金價。與會人士認為 ORION 拼不過大陸設廠的公司。是自取滅亡。不能因此無理要求

其他人漲內銷係數或自行調低美金報價。此即有請總部向 ORION 高層反應。

CONFIDENTIAL - GRAND JURY MATERIAL

**14" Color Monitor Production in China**1st half v.s. 2nd half in 1998

						Kpcs	
Maker		1st half	2nd half	Total	Domestic Sales	Major Suppliers & Ratio	*S
Taiwanese	Acer	140	110	250	60	C/P: 6/4	
	ADI	400	260	660	170	S	
	Compal	100	80	180	0	C	
	FIC	30	20	50	0	<del>C/P: 7/3</del>	
	GVC	80	120	200	0	C/O: 5/5	
	IRICO	185	165	350	0	P/B: 8/2	
	Lite-on	210	240	450	100	C	
	MAG	45	10	55	0	S	
	Philips	560	520	1080	300	C/P: 5/5	
	Proview	450	250	700	250	S	
	Sharmrock	140	120	260	0	C/S: 7/3	
	Top Victory	660	440	1100	450	C/O/P: 5/4/1	
	Others	100	80	180	170		
Total		3100	2415	5515	1500		
Chinese	Founder	250	150	400	320	S/P: 7/3	
	Great Wall	90	50	140	120	S	
	Qing Hong	300	40	340	300	closed in Aug.	
	West Lake	30	20	50	30		
	Xococo	150	100	250	220	S	
	Yuki	50	20	70	70	S/P: 7/3	
	Others	70	50	120	90		
	Total	940	430	1370	1150		
Korean	Daewoo	100	70	170	150	O	
	LG	0	0	0	0		
	Samsung	120	80	200	200	S	
	Total	220	150	370	350		
Japanese	NPG	90	60	150	100		

(P)

PHS

B. C.

# EXHIBIT 9



June 20, 2012

**Certification**

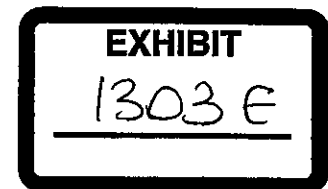
**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range: CHU00030688E - CHU00030691E.

A handwritten signature in cursive script, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager



Park

Case

#

29567



**[TRANSLATION]**

[Entire Document Handwritten]

Business Trip Report

Page 1 of 3

To: → Wei-Lie Yu [Hand-drawn star]

Date: Dec. 8-10, 1998

Location: Beijing

[Initialed:] Lu 12/11'98

Meeting Attendees: *CPT*: Wen-Chun (Tony) Cheng, Jing-Song (Jason) Lu,  
 Ching-Yuan (Michael) Du, Chung-Cheng (Alex) Yeh  
*PHS*: Shou-Li Lin, Cheng-Er Shao, Dong Liu  
*SSDD*: MR. D. Y. Kim, M.S. Lee, etc.  
*LG*: MR.  
*ORION*: MR. Moon, MR. Kong... etc.  
*IRICO*: President Ma... etc.  
*BMCC*: Wen-Chiang Fan, Hsin-Wen Huang

[In left margin:] *COPY x 1*

Content:

This is a routine China *CDT MAKER* contact meeting. Since many disputes rose from the past few meetings, it was decided at the top-level meeting held during 11/E in Seoul that the headquarters of each maker would send representatives to attend this meeting (12/9 PM). In addition, on 12/10 AM, five of the Taiwan and Korea makers will separately hold a coordination meeting.

Production Sales and Inventory statuses for respective makers:

		NOV			DEC			JAN	FEB
		Prod'n	Sales	Stock	Prod'n	Sales	Stock (C+M)	Prod'n	Prod'n
<i>CPTF</i>	14"	112	117	173	0	60	110+70	0	0
	15"	40	33	7	60	60		100	100 [Crossed out by hand]
									70-80
<i>LG</i>	14"	0	4	—	0	0	0	0	0
	15"	0	6	—	0	9	0	0	0
<i>PHILIPS</i>	14"	120	80 ( <sup>50</sup> / <sub>30</sub> )	80	120	70 ( <sup>50</sup> / <sub>20</sub> )	100	60	40
	15"		20	0	0	20		10	30
<i>ORION</i>	14"		30	140	70	25	70		
	15"		40	—	—	50	—	—	—
<i>IRICO</i>	15"	31	30	1	37	35		40	45
<i>BMCC</i>	14"	40	20	40	30	30	40	30	30
<i>SSDD</i>	14"	180	120	80	150	120	100+40	100	100
<i>TTL</i>	14"	452	371	373	300	305-325	(530)	190	170
	15"	71	89-99	7	97	164-174		150	145

English words found in the original text are *italicized*.  
 Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030688E

Translation

## Explanation:

1. Market demand for 14" is shrinking dramatically. The market situation of all makers is poor.
2. *LG* will stop the production of 14" starting from January 1999.
3. *PHS* originally planned to transfer the 15" production line from Chubei to Huafei, but it was *hold* because the *cost* was too high. However, currently, it has 2 existing lines of 14". In December, only one line was utilized, the other line's produce equipment was converted. It is estimated that the production of 15" will begin in January, '99. Estimated that JAN/10k, FEB/30k [Underlined].
4. *BMCC* originally planned to begin the production of 15" in January. However, since neither of the facilities and materials all are presently *OK*, it is estimated that the switch will not begin until May [Underlined].

## (2) Market Price Review

1. First, *PHS* pointed out that *SSDD*, *Orion*, *BMCC*, and *LG* gave quotes that were lower than the fixed current prices they have committed to for certain customers. An explanation was requested. After the makers explained the evidence to each other, *SSDD* admitted that their quote to *XOCECO* was lower than the set price, *RMB* 500- (should be 520-). *MR. D. Y. Kim* expressed regret and will adjust the price immediately.
2. *ORION* still states that since the smuggling channels were blocked, its imported *CRTs* in China have no competitive edge at all facing the quotes of *local CDT MAKER* at *RMB* (10.4). Therefore, without alternatives, it had to compete using the prices of *USD* 45-46. After a joint discussion among the attendees and agreement from *SSDD*, China Great Wall, Beijing Founder and *XOCECO* three makers' consent *ORION* quoted at low *USD* 20, which is the equivalent of a *RMB* quote

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

of *RMB* 520-. This is limited to these 3 makers only.

3. At the meeting on the morning of 12/10, it was suggested to *follow* the Japan makers' price increase\beginning on *JAN/16*, to, 17" price will be at least 5.00/*pc*.
4. The market *demand by size* in '99

October Projection			December Revision	
14"	141 <i>M</i>	149%	7.5 <i>M</i>	8%
15"	37.4 <i>M</i>	39.6%	37 <i>M</i>	39%
17"	35.4 <i>M</i>	37.5%	41 <i>M</i>	43.4%
19"	4.8 <i>M</i>	5.1%	6 <i>M</i>	6.4%
20"/21"	2.7 <i>M</i>	2.9%	2.7 <i>M</i>	2.8%
<u>TTL 94.4<i>M</i></u>			<u>94.4<i>M</i></u>	

- End of report -

[Signed:] Submitted by Employee Chung-Cheng (Alex) Yeh 12/11 '98

[Signed:] Y. M. Peng, *DEC* 16 '98

[Handwritten in a different style:]

\*Yu, please *FAX* on my behalf to my younger sister (*Taipei*), and tell her to: "sell my car." I will make contact when I return. *TKS! FAX NO. AS FOLLOWS:*

To: 00886 2 28261648 Li-Hua Tai

[Signed:] Guang-Hui Tai  
12/30'98

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030690E

Translation

0591 3970507

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030691E

Translation

# EXHIBIT 10



가장 친절한 LG

Display 해외영업담당  
해외마케팅팀/課長

鄭 風 龍

150-721 서울특별시 영등포구 여의도동 20  
LG트윈타워  
전화: 02-3777-7568 FAX: 02-3777-5560  
E-Mail: pyjeong@twin.lge.co.kr  
불친절 신고센터 : 080-023-7777

가장 친절한 LG

Display 사업본부  
해외기획팀/課長

金 斗 基

150-721 Seoul特別市 永登浦區 汝矣島洞 20番地  
LG Twin Tower  
電話: 02-3777-7595 FAX: 02-3777-5560  
E-Mail ID: doogie@lge.co.kr  
불친절 신고센터 : 080-023-7777

彩虹集团公司

副 总 裁

彩虹彩色显像管总厂

常务副厂长

马金泉

12/9/98

地址: 中国陕西咸阳彩虹路1号  
电话: (0910)3334118  
传真: (0910)3313762 邮编: 712021

PHILIPS

華飛彩色顯示系統有限公司

劉 東  
商務部處長南京市玄武區  
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郵政信箱: 2808電話: (86-25)5421166-2128/2120  
傳真: (86-25)5422227/5417470  
Internet: CNF00116@CNCOMAIL.SKADS.PHILIPS.NL

12/8/98

飛利浦

SAMSUNG

삼성전관

이재인

담당간부  
마케팅전략  
브자원)마케팅팀삼성전관주식회사  
서울 중구 태평로 2가120  
대경빌딩 12층 100-102  
TEL: 02-727-3469  
FAX: 02-727-3409BMCC/National-Panasonic  
北京·松下彩色显像管有限公司获证企业  
ISO9002  
ISO14001

永 井 武

董事 總經理

12/9/98

地址: 北京市朝陽區大山子  
酒仙橋北路9號  
郵政編碼: 100015電話: (直撥)64376178 64363355-2001  
電報: 2795 或 BMCC  
傳真: 64376154Exhibit  
Wang 8576

9/20/2022

Wang Zhaojie - V2



**LG Electronics Inc.**

The Most Courteous LG

**Doogie(K) Kim**

Manager  
OVERSEAS PLANNING TEAM  
DISPLAY DIVISION

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E-Mail ID : doogie@lge.co.kr

12/9/98



**LG Electronics Inc.**

The Most Courteous LG

**P. Y. JEONG**

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12/9/98



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**Liu Dong**

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**MA JINQUAN**

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**DEPUTY PRESIDENT**  
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**Beijing Matsushita Color CRT Co., Ltd.**

**NAGAI TAKESHI**

Director President

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**SAMSUNG**

**DISPLAY DEVICES**

**LEE JAE IN**

Manager  
Marketing Part  
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12/9/98

# EXHIBIT 11

## Filed Under Seal



# EXHIBIT 12

## Filed Under Seal

# EXHIBIT 13



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00030705E - CHU00030708E.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager

□□□□□□□□□□

04/02 '99 15:01 591 3970507 CPTF 001

[Handwritten:] *Tony Dai Du*  
*Fax TO CFC*

Respectfully submit to: Senior Manager Cheng/Director  
Submitted for approval

### Contact Report

Meeting Subject: Mainland China *CDT MAKER* Market Exchange

Time: *FEB.* 02, 1999

Location: Shenzhen

Attendees:

*CPTF*: Senior Manager Lu, Guang-Hui Dai

*PHS*: Zheng-Xi Shao, Sales Manager, Huafei: Yi-Wang, Song Lin

*SSDD*: Ming-Zhi Lee, Zhen Yang

*LG*: Zhong-Feng Park, Section Chief

*ORION*: Tae Sik Kong (*TAE.SIK.KONG*) Section Chief

Irigo (*IRICO*): Chao-Jie Wang

*BMCC*: Xin-Wen Huang, Senior Manager

Agenda for this meeting:

- I. *JAN/FEB* '99 & '99 *YEAR* production and sales information exchange
- II. '98 *PC* & *C-MONITOR* Production and sales status (*IN CHINA*)
- III. '98/'99 *C-MONITOR*-Market Demand Discussion by Customer (*IN CHINA*)

Content:

1. *JAN/FEB* '99 & '99 *YEAR* Production & Sales Information Exchange

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

[Handwritten:] Referring to its true inventory on hand.

JAN/FEB. '99 &amp; '99 YEAR

Unit: *K PCS*

		'99 JAN.					'99 FEB.					'99 Planned Production	'99 Planned Sales IN <i>CHINA</i>
		PROD	SALES IN CHINA			STOCK	PROD	SALES TO CHINA			STOCK		
			TTL	Export Sales	Domestic Sales			TTL	Export Sales	Domestic Sales			
Huafei	14"	72	88(68)	(58)	(10)	85(210)	60	60			86(210)	750	
	15"						10				10	680	
PHS(BU)	15"		65					60					
	17"		10					10					
SSDD	14"	100	75	50	25	95(SSDD) 30(MSDD)	60	50			105	1800	
	15"											700	
	17"											300	
SDD	15"		186										
	17"		122										
BMCC	14"	35	20		20	60	30	20		20	70	120	
	15"											320	
ORION	14"		20					10					200
	15:		50					50					900
	17"							5					300
IRICO	15"	54	50	10	40	9	40	41			8	600	
CPTF	4"	61	73	73		108(CPTF) 70(CPTM)	30	70			68	900	
	15"	114	103	103		22	95	100			17	2400	
LG	15"		120					100					1500
	17"		205					200					2500
TTL	14"		256			573		210			453	3770	
TTL	15"		574			31		351			35	4700	
TTL	17"		337			0		215			0	300	
TTL												8770	

*CPT* and *ORION* did not include headquarters sales to Taiwan (export models).

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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Translation

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## Explanation:

1. *SSDD*: After being reconfirmed, its 15" SKDL will begin M/P in Tianjin factory (TSED) in June of this year [Underlined by hand], in addition, its Shenzhen factory(SSDD) was set to M/P 17" in October this year [Underlined by hand] [Handwritten note with an arrow to text: "(Samsung Kangning) July"], but Department Manager Lee was unable to indicate certainly on its input timing during the meeting.
2. *Huafei*: In last meeting, *PHS* indicated that since it needed [Illegible handwriting above text] to report to China Electronic Data Department, therefore, the above-mentioned sales and inventory data contained in "( )" for *JAN/FEB* should be considered true figures. Also, its' 15" utilization is planned to begin small volume output in February.
3. *ORION*: It was originally learned from the Taipei Regular Exchange Meeting held on 1/13 that 14" has ceased production in March. After reconfirmation, MR. Kong claimed that it was the 14"S/T's production which was stopped [Underlined by hand]. The original 14" line will be converted to a 14"/15" mixed line in May; in addition, 15" Mini tubes are also expected to be launched in May [Underlined by hand].
4. *BMCC*: 5/1 will begin mass production of 15" *CDT*. *PHS/SSDD* and other makers expressed strong protest regarding is *RMB\$455* pricing for 14" (*IF KEEP BASED ON 10.4* as coefficient used for domestic sale quotes, which is equivalent of *US\$44*), it was hoped that *BMCC* should go by the agreement and not to disrupt market pricing.
5. *PHS*: Although 14" inventory is as high as 200K, but it would be break the agreement because of it by disrupting the market pricing with low prices [Underlined by hand]. In addition, its 15" will begin loading for trial run as planned.
6. The volume of '99 planned production and *LG/ORION*'s plan to sell to Mainland China is as shown above (Chart 1); estimated demands by customers are shown in (Chart 4) after discussion by respective *CDT MAKER*.

II □ 98 PC & C-MONITOR production and sales status (*IN CHINA*)

*SDD* was the first to provide its color monitor market study on Mainland China by its marketing department of headquarters in Korea (Chart 1) - (Chart 3).

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

(Chart 1) *CHINA C-MONITOR MARKET DEMAND**UNIT: M PCS*

	1997		1998		1999	
WORLD-WIDE	76.3		85.2		94.4	
IN CHINA	11.3	15%	18.2	21%	23.5	25%
Taiwanese Markers	8.8	78%	14.6	80%	18.2	77%
Korean Makers	0.3	3%	0.5	3%	1.3	6%
CHINA LOCAL businesses	2.2	19%	3.1	17%	4.0	17%
TTL	11.3	100%	18.2	100%	23.5	100%

*SOURCE: SDD MARKETING DEPT*(Chart 2) *CHINA C-MONITOR MARKET DEMAND BY PRODUCT* *UNIT: M PCS*

	'98			'99		
	W/W	CHINA	%	W/W	CHINA	%
14"	15.2	7.6	50%	9.4	6.8	72%
15"	36.5	7.4	20.3%	37	9.2	25%
17"	28.1	2.9	10.3%	39	6.5	17%
19"	2.5	0.3	10.7%	6	0.6	10%
21"	2.6	0	0	3	0	0
TTL	85.2	18.2	21%	94.4	23.5	25%

*SOURCE: SDD MARKETING DEPT*

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(Chart 3) 1998 *C-MONITOR DOMESTIC SALES IN CHIAN* [sic] *UNIT: M PCS*

	1997		1998		1999	
TTL	3.62M		4.15M		4.80M	
	QTY	%	QTY	%	QTY	%
14"	251	69.2	185	44.5	170	35.5
15"	74	20.4%	187	45%	245	51%
17"	8	2.3%	20	4.8%	41	8.5%
19"	4	1.1%	6	1.4%	7	1.5%
MDT	25	7%	17	4.3%	17	3.5%

*SOURCE:* (China Information Industry Department—*SDD MARKETING DEPT. RENDER*)

III. 1998/1999 *C-MONITOR* – Market Demand Discussion by Customer (*IN CHINA*)

(Chart 4) 1998 *C-MONITOR DEMAND*/1999 *FORECAST DEMAND IN CHINA**UNIT: M PCS*

CUSTOMER	'98	'99	DATA RENDER
EMC	3	5	SSDD
AOC	3.3	5	CPTF
PHS	2.2	3	CPTF/PHS
IRICO+ROYAL	3	3	PHS
LI-ON	1.4	3.5	CPTF
ADI	1.2	1.3	CPTF
ACER	0.9	1.5	CPTF
COMPAL	1.2	2	CPTF
FOUNDER	0.8	1	SSDD
XOCECO Xiahua	0.5	0.7	SSDD
CGC Changchang	0.3	0.5	SSDD
SEC Tiajin	0.4	0.6	SSDD
NPG	0.6	0.9	SSDD
LG Tongchuang	0.1	0.4	LG
FIC	0.3	0.5	PHS
DAEWOO Weihai	0.3	0.6	IRICO
RIVETEL	0	0.3	CPTF
HYUNDAI Tianjin	0	0.6	SSDD
OTHERS	1	1	
TTL	19.5	31.4	

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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Translation



Explanation:

1998 *C-MONITOR* actual production results in Mainland China region reached approximately 19.5*M PCS* after discussion among respective makers. (Our current information shows 16.7*M PCS*), the primary discrepancy is at “*CHINA OTHERS*”; we used 0.14*M PCS* for our estimate, and yet the attendees used 1*M PCS* to approximate. In 1999, production estimate for respective makers of *C-MONITOR* is 31.4*M PCS* (a larger discrepancy comparing to the 23.5*M PCS* shown in Chart 1 & 2). Above-mentioned information is provided for our *MARKETING DEPT.* for reference and reconfirmation purpose only.

[Handwritten:] 1998 Mainland China actual results of *CM* production should be around 20*M*, but 1999 estimated volume should be at least 30*M* to be reasonable!

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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## IV. Conclusion

1. Other than *SHARE* market information mutually, the more important issue for this discussion of global and regional color monitor markets' demand status is to hope that all makers may continue to maintain their efforts in control pricing by production volume of respective sizes.
2. 14"/15" almost have no profits under the current pricing, all makers should continue to persist pricing on 14"/15"; in particular, since *BMCC* has attended the meeting, while respective makers already made sacrifices in output sales volume, it should make specific contribution to the goal of this meeting by not disrupting the market pricing.
3. As far as how to extend 14"CDT's product lifespan, SSDD is especially worried and called out to all makers to put their thoughts together for the benefits of all. If 15"/17" cannot price up again to differentiate price gap to 14", it would be a great concern on the speedy decline on the demands for 14" [Underlined by hand].
4. *PHS* will be hosting the next meeting. Time: *MARCH* 11, 1999, Location: To be determined at either Shanghai or Nanjing.

--End of report-- Submitted for approval

Respectfully submitted by Employee Guang-Hui Dai  
FEB. 04, 1999

[Handwritten:] Department Manger of Samsung Ming-Zhi Lee continue to stress that the price differential for 14"/15" should be maintained at least @USD15<sup>↑</sup>, otherwise it will speed up the decline of 14". Although I repeatedly explained to him that the decline for 14" demands is because of the market trend, and 15"'s gross profit is much higher than 14", but he still insists on his view (since Shenzhen factory only produces 14"CDT) [Underlined]. *PHS* Senior Manager Shao reflected his recommendations to the *TOP MANAGEMENT MEETING*, to either price up on 15"CDT selling price or reduce 14"CDT pricing.

[Initialed:] Chih-Chun (C.C.) Liu 2/5

[Initialed:] Jing-Song (Jason) Lu 2/4/1999

[Initialed:] Chen-Cheng (Tony) Chien 2/5

[Initialed:] Chieng-Yuan (C.Y.) Lin 2/5

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CPTF  
接洽報告Fix To CAC  
敬呈 郭經理 處長

會議主題：大陸 CDT MAKER 市場交流

時間：FEB.02,1999

地點：深圳

與會人員：

CPTF：呂經理、戴光輝

PHS：邵正璽業務經理、華飛王毅、林嵩

SSDD：李明植部長、楊真

LG：朴鍾鳳課長

ORION：孔泰植(TAE.SIK.KONG)課長

彩虹 IRICO：王昭杰

BMCC：黃新文經理

本次議題：

一、JAN./ FEB. '99 &amp; '99 YEAR 產銷訊息交換

二、'98 PC &amp; C-MONITOR 產銷狀況(IN CHINA)

三、'98/'99 C-MONITOR-客戶別市場需求探討(IN CHINA)

內容：

一、JAN./ FEB. '99 &amp; '99 YEAR 產銷訊息交換

UNIT: K PCS

	'99 JAN.					'99 FEB.					'99 計畫生產	'99 計畫銷售 IN CHINA
	PROD.	SALES IN CHINA			STOCK	PROD.	SALES TO CHINA			STOCK		
		TTL	外銷	內銷			TTL	外銷	內銷			
華飛 14"	72	88(68)	(58)	(10)	86(210)	60	60			86(210)	750	
15"						10				10	680	
PHS(BU) 15"		65					60					
17"		10					10					
SSDD 14"	100	75	50	25	95(SSDD) 30(MSDD)	60	50			105	1800	
15"											700	
17"											300	
SDD 15"		186										
17"		122										
BMCC 14"	35	20		20	60	30	20		20	70	120	
15"											320	
ORION 14"		20					10					200
15"		50					50					900
17"							5					300
IRICO 15"	54	50	10	40	9	40	41			8	600	
CPTF 14"	61	73	73		108(CPTF) 70(CPTM)	30	70			68	900	
15"	114	103	103		22	95	100			17	2400	
LG 15"		120					100					1500
17"		205					200					2500
TTL 14"		256			573		210			453	3770	
TTL 15"		574			31		351			35	4700	
TTL 17"		337			0		215			0	300	
TTL										8770		

CPTF ORION 14" 15" 17" 外銷 內銷 部分

CPTF

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## 說明

- 1) SSDD: 經再次確認, 其天津廠(TSED) 15" SKDL 將於今年六月始 M/P, 另其深圳廠(SSDD)原定 17" 今年 10 月可 M/P, 但會中李部長未能對其動工時間表示確定。
- 2) 華飛: 前次會議中 PHS 即表示因需報請中國電子訊息部, 因此上述 JAN./FEB. 銷售及庫存數據仍應以"( )"內之數字為真實。另其 15" 稼動擬於 2 月份始少量產出。
- 3) ORION: 1/13 台北定期交流會中原獲悉 3 月停產 14"。經再次確認, MR. 孔稱係 14" S/T 不生產, 原 14" 將於五月份改為 14"/15" 兼容; 另 15" Mini 管亦預計五月份推出。
- 4) BMCC: 5/1 始量產 15" CDT。對於 14" 以 RMB\$455 (IF KEEP BASED ON 10.4 係數作為內銷報價則相當 US\$44) 遭 PHS/SSDD 等各家之強烈抗議, 希望 BMCC 遵守協議不要擾亂市場行情。
- 5) PHS: 14" 庫存雖高達 200K 但不會因此而破壞協議以低價擾亂市場行情。另其 15" 仍依計畫在 2 月份開始稼動試產。
- 6) '99 計畫生產及 LG/ORION 計畫銷售至大陸之數量如上(表一); 客戶別之需求預估經各 CDT MAKER 討論後如(表四)所示。

## 二、'98 PC &amp; C-MONITOR 產銷狀況(IN CHINA)

SDD 首先提供其韓國本社市場部門有關中國大陸地區彩監市場之研究如下(表一)~(表三)

(表一) CHINA C-MONITOR MARKET DEMAND

UNIT: M PCS

	'97 年		'98 年		'99 年	
WORLD-WIDE	76.3		85.2		94.4	
IN CHINA	11.3	15%	18.2	21%	23.5	25%
台商企業	8.8	78%	14.6	80%	18.2	77%
韓商企業	0.3	3%	0.5	3%	1.3	6%
CHINA LOCAL 企業	2.2	19%	3.1	17%	4.0	17%
TTL	11.3	100%	18.2	100%	23.5	100%

SOURCE: SDD MARKETING DEPT.

(表二) CHINA C-MONITOR MARKET DEMAND BY PRODUCT

UNIT: M PCS

	'98			'99		
	W/W	CHINA	%	W/W	CHINA	%
14"	15.2	7.6	50%	9.4	6.8	72%
15"	36.5	7.4	20.3%	37	9.2	25%
17"	28.1	2.9	10.3%	39	6.5	17%
19"	2.8	0.3	10.7%	6	0.6	10%
21"	2.6	0	0	3	0	0
TTL	85.2	18.2	21%	94.4	23.5	25%

SOURCE: SDD MARKETING DEPT.

(表三) '98 C-MONITOR DOMESTIC SALES IN CHIAN UNIT: M PCS

	'97		'98		'99	
TTL	362 萬		415 萬		480 萬	
	Q'TY	%	Q'TY	%	Q'TY	%
14"	251	69.2	185	44.5	170	35.5
15"	74	20.4%	187	45%	245	51%
17"	8	2.3%	20	4.8%	41	8.5%
19"	4	1.1%	6	1.4%	7	1.5%
MDT	25	7%	17	4.3%	17	3.5%

SOURCE: (中國訊息產業部--SDD MARKETING DEPT.RENDER)

## 三、'98/'99 C-MONITOR-客戶別市場需求探討(IN CHINA)

(表四) '98 C-MONITOR DEMAND / '99 FORCAST DEMAND IN CHINA UNIT: M PCS

CUSTOMER	'98	'99	DATA RENDER
EMC	3	5	SSDD
AOC	3.3	5	CPTF
PHS	2.2	3	CPTF/PHS
IRICO+ROYAL	2	3	PHS
LI-ON	1.4	3.5	CPTF
ADI	1.2	1.3	CPTF
ACER	0.9	1.5	CPTF
COMPAL	1.2	2	CPTF
FOUNDER	0.8	1	SSDD
XOCECO 廈華	0.5	0.7	SSDD
CGC 長城	0.3	0.5	SSDD
SEC(天津)	0.4	0.6	SSDD
NPG	0.6	0.9	SSDD
LG 同創	0.1	0.4	LG
FIC	0.3	0.5	PHS
DAEWOO(威海)	0.3	0.6	IRICO
RIVETEL	0	0.3	CPTF
HYUNDAI(天津)	0	0.6	SSDD
OTHERS	1	1	
TTL	19.5	31.4	

說明:

'98 年大陸地區 C-MONITOR 生產實績經各廠家討論後約達 19.5M PCS(我方現有資料為 16.7M PCS), 差異部份主要在"CHINA OTHERS"; 我方係以 0.14M PCS 估算, 而與會各家則以 1M PCS 概算。另'99 各家 C-MONITOR 生產預估數為 31.4M PCS(與表一、二顯示之 23.5M PCS 差距較大)。上述資料僅提供我 MARKETING DEPT. 參考再確認。

1998 年大陸 CM 生產實績約在 20M 左右, 而 1999 年預估產量應在 30M 才合理!



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## 四、結論

1. 本次探討全球及地區性彩監市場供需情形，除了相互 SHARE 市場訊息外更重要的是希望各家在各尺寸能繼續維持以量制價之行動。
2. 14"/15"在現有價格下幾無利潤，各家應繼續堅持 14"/15"價位。尤其 BMCC 既然與會，在大家已作出產銷量之犧牲後更應對本會議宗旨作出具體之貢獻，不要擾亂市場行情。
3. 對於應如何延長 14" CDT 之產品生命，SSDD 特別憂心並呼籲各家集思廣益。倘若 15"/17"無法再調漲以擴大與 14"之差距，則 14"需求萎縮之速度堪慮。
4. 下次會議由 PHS 主辦。時間：MARCH 11, '99。地點：上海或南京另議

--以上報告-- 呈核

職 戴光輝 敬呈

FEB. 04, 1999

汪明極部長 - 並呈請 14"/15" 價差最少案作對 @ 15" ↑,  
 否則 14" 加速萎縮, 難維持 - 再由其解釋 14" 需求萎縮是市場趨勢  
 勢所致, 且 15" 遠較 14" 毛利高, 但是仍堅持 (因學理上) 欲求生產  
 14" CDT). PHS 邱經理將是建議向 TOP MANAGEMENT NEGOTIATIONS 反  
 映, 即將 15" CDT 售價或調降 14" CDT 價格。

5/5, 1/2  
 1999

5/5

# EXHIBIT 14



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range: CHU00030734 - CHU00030737.

A handwritten signature in cursive script, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager

Park Case # 29567

D ☐ P ☐ Exhibit 8421  
Deponent Wang  
Date 3/8/19 Rptr BW



## [TRANSLATION]

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[Handwritten:]

Tai → Yu

FAX To CPTC

Submitted respectfully to Manager Wen-Chun (Tony) Cheng, / Director

→ Tony

Respective Officers → Du

Submitted for approval

## Contact Report

Meeting Topic: China *CDT MAKER* Market Information Exchange

Date: 99/04/02

Location: Nanjing

Attendees: *CPTF*: Manager Jing -Song (Jason) Lu, Wei-Lie Yu  
*PHS*: Manager Zheng-Er Shao, Director Dong Liu  
 Mr. He Xu, Mr. Bing Ma  
*SSDD*: Department Manager Ming-Zhi Li, Manager/Tianjin  
 Samsung Market Department Yu-Huan Wu,  
 Mr. Zhen Yang  
*ORION*: Mr. Rong-Ji Hong/Shanghai Representative Office  
*IRICO*: Mr. Zhao-Jie Wang  
*BMCC*: Ms. Ping Zhang

Content:

## I. Production and Sales Information Exchange for March and April 1999

		'99 MAR					'99 APR [Corrected by hand]					Plan in '99	15'' import quantity on March
		PROD	Sales (IN CHINA)			Inventory	PROD	Sales (IN CHINA)			Inventory		
			total	over-seas	dom-estic			total	over-seas	dom-estic			
CPT	14''	123	99	99	0	92	95	126	126		61	900	
	15''	178	151	151	0	53	162	158			57	2,300	280
Huafei	14''	81	85	40	45	186	60	80			165	500	
	15''	48	40	10	30	8	50	50			8	900	50
Samsung	14''	140	120	60	60	95	160	140			115	1,000	
	15''	0	0			0	20	15			5	700/May B	170
	17''											500/August B	
IRICO	15''	62	67	10	57	13	60	63			10	900	
Kitamatsu	14''	30	32			50	30	20			60	35K/M to June B	
	15''											August B	

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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Translation

Daewoo	14"		50		50		60	6				230	
	15"				60	20	300	60				3,800	60
LG	15"				70								70
TL	14"		386									2,580	
	15"		258									4,950	630
	17"											500	

*RE:* Cumulative 15" *CDT* sales volume in China for March 1999 was (258+630) = 888K.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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Translation

## Explanation:

## 1. Samsung Electronics:

- (1) Shenzhen Samsung originally planned to add one new 17" *CDT* line, but due to funding problems it converted the 14" *CDT* production line instead. It is expected that mass production will start in August of this year. The line conversion process will start in May. Department Manager Li indicated that this production line will be designed for a 14"/ 17" single-direction compatible production line.
- (2) Starting in April, Tianjin Samsung will use *SKD* to import *ITC* for its 15" *CDTs* delivery. It's expected to officially start mass production in May.
- (3) Department Manager Li also indicated that their single 15" *CDT* line in the Malaysian factory will be converted to production of *MINI-NECK* tubes (with mass production starting in April). The single 14" *TV* line will be converted to produce 17" *CDT* (mass production starts in May).

## 2. Nanjing Huafei:

- (1) Looking at the delivery situation for 15" equipment, it is expected that the present 14" *CDT* line will be converted to a 15" *CDT* at 6/E~7/B. At such time, two lines will be utilized for the production of 15" *CDT*, and it is planned that these will be 14" and 15" *CDT* compatible lines. 14" *CDT* production will be determined on the basis of the inventory and market situation at that time.
- (2) Senior Manager Shao stated that since Huafei's 15" *CDT* mass production has increased, production in Taiwan will be reduced at the appropriate time. It is expected to move 2 of its 15" *CDT* production lines to Huafei in '99/B.

[Handwritten:] Chubei factory (currently has 15" *CDT Lines* x 5)

## 3. IRICO:

- (1) The cooperation plan with *TSB* for 17" *CDT* has been basically confirmed (capital and project set-up have been completed, and the technology contract was completed during the 15" *CDT* plan implementation). It will convert the current 14" *CPT* production line. The overall plan has not yet been confirmed.
- (2) Compared with 1998, IRICO's 15" *CDT* import materials and parts costs have decreased, and its processing technology has been improved. At present, its electronic guns are manufactured by assembling imported spare parts. *DYs* are transferred from Xianyang, China, as well as provided by the Cai Dong Company. Mr. Wang indicated that the company will be striving to increase its production by about 800 ~ 900K in 1999 compared with the previous year, and also to reduce the level of losses by 1/2. [Handwritten:] It said that in 1998, from the 15" *CDT Line* alone, losses exceeded 100,000,000 *RMB*].

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

- (3) Mr. Wang indicated that handling of *ASC* and *A/G* tube surfaces of its 15" *CDT* products, are the same kind of product. [Handwritten:] That means there is only the *AS* tube model.

4. Kitamatsu:

At present, their 14" *CDT* is still incompatible for mass production with *CPT* (1/2 line). At present, it has been decided that mass production of the 15" *CDT* will start in August. However, whether or not it will be a full line [illegible] utilization has not yet been determined. Since the 15" *CDT* equipment is already in place, there should be no plans for 17" *CDT* mass production this year.

5. Daewoo:

Mr. Hong indicated that *CM* is their main purchaser in Shanghai. Originally, it used *SKD* as a transfer port, but 14" *CDT* trade will stop since Korea Daewoo will stop production in May. It is heard that *ORION*'s current 14" *CDT* inventory is around 100K. [Handwritten:] Mainly reserved for *AOC*.

6. The mass production situations of the respective *CDT-MAKERS* in China, starting from August 1999, are as follows:

VENDOR	Production Lines	Size	Production Capacity (K/M)
Huafei	2	15"	120
CPT(F)	0.5	14"	80
	1.5	15"	240
Samsung	1(TSDD)	15"	150
	1(SSDD)	17"	100
IRICO	1	15"	80
Kitamatsu	0.5 (Temporary)	15"	30
TOTAL (K/M)	14"/80, 15"/630, 17"/100		

[Handwritten:] But *PHS* and *SDD* can change back to producing 14" *CDT* at any time. Also, neither of them have low inventories of finished products.

[Illegible handwriting] 4/5/'99

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].



[Illegible] 18:16

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## II. Market Information Exchange

1. Starting May 1<sup>st</sup>, the price of 17" *CDT* will officially be increased by *USD 5* [Handwritten: "??"] (*BASE ON @ USD 98/MPR 2*).
2. *CM W/W – CHN Demand Situation and Estimated Volume of 15" CDT Domestic Sales in China.*

Table 1:

		W/W	CHN
	98	85M	21M (16.5M FOR EXPORT, 4.5M FOR DOMESTIC)
	99	94M	33M (27M FOR EXPORT, 6M FOR DOMESTIC)

Table 2:

		'98(4.5M)	'99(6M)	RE
14"		1.7M	1M	'99.15" CDT Main Domestic Sale Volumes: CPTF/700K, HF/500K, SDD/500K, LG/500K, IRICO/800K, BMCC/100K, T.L: 3,100K.
15"		2.3M	3.2M	
17"		0.5M	0.8M	

3. Attendees complained that IRICO's 15" *CDT* sales price is already much lower than the current market price (which, calculated with *64K/ASC. ITC*, should be *RMB 665*). Mr. Wang explained that their 15" (*64K/ASC. ITC*) price is currently *RMB 630*, and that this is the transaction price with Shenzhen IRICO and Weihai Daewoo. After a discussion, the following was decided: to prevent unreasonable prices affecting normal market prices, and since the transaction volume between these two makers is already about 90% of IRICO's production volume, the attendees agreed that this price is considered a price for internal transactions (Weihai had *DY* supply transactions with the other one). Both makers were asked to increase their external sales price to the current market price (which, calculated by using *64K/MPR2. ITC*, should be *RMB 675*, and gradually decrease by *RMB 10* for each level). [Handwritten:] That is the export price, *@USD 65* as the price.
4. Regarding Kitamatsu: at present the 14" *CDT* price is only *RMB 420 – 430*. This was calculated by using *48K/STD. ITC*, though the current sales price of the 14" is lower than the current market price that was set previously (which is only about *RMB 470 – 480*, as calculated by using *STD/K*). In order to ensure that the 14" *CDT* sale prices are orderly and to avoid malicious competition, Kitamatsu was asked to strive to *KEEP* the prices at *RMB 450*. [Handwritten:] *SDD* and *PHS*'s 14" domestic sales prices are probably also only *RMB 470*, or even lower!

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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Translation

## III. Conclusion:

1. Except for the internal transaction prices given to Cai Huang and Weihai by IRICO, the 15" *CDT* sales price for the rest of the makers needs to *KEEP* at *RMB* 675 (calculated by using *64K/MPR2. ITC*, it should be @*RMB* 675 and gradually decrease by *RMB* 10 for each level). Since 15" *CDT* and *CM* production and sales are roughly balanced in China, it is feared that overall the *W/W* supply is greater than demand which will affect the maintenance of the 15" price.
2. In reality, the 14" *CDT* price has now collapsed. Calculated using tube *STD/K*, it is currently only *RMB* 470~480 (this is approximately *USD* 46, lower than the industry standard price by *USD* 3). In addition, starting in August, 1999, except for CPT, all makers will suspend production of 14" *CDT*. (Huafei and Kitamatsu will convert it to produce 15" and Samsung will convert it to produce 17").
3. Because transactions in the China market are less standardized, especially with payment and tax issues, and we are currently in the *CM* slow season, the proposal originally submitted by CPTF for a review of the change of the USD and RMB exchange rate from 10.4 to 10.6, is now temporarily on HOLD. [Underlined by hand] and the price calculation coefficient of 10.4 shall be retained.

[Handwritten:] At this *meeting*, because we spoke up strongly, the unreasonable domestic sales prices was seriously reviewed. 15" is the main point in the future and everyone agreed to go back to the export base price of @*USD* 65 and a price calculation coefficient for domestic sales of 10.4. IRICO agreed to cooperate, which should be the key point.

[Submitted and Signed:] Wei-Lie Yu, 4/5'99

[Initialed:] Chen-Cheng (Tony) Chien, 4/6

[Initialed:] Chih-Chun (C.C.) Liu, 4/6

[Initialed:] Chieng-Yuan (C.Y.) Lin, 4/6

[Initialed:] Jing-Song (Jason) Lu, 4/5 '99

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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Translation

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CHU00030737E

Translation

05/04 '99 18:07 591 3970507

CPTF

001

会议主题: 大陆 CDT MAKER 市场交流

时间: 99/04/02

地点: 南京

与会人员:

CPTF: 吕经理, 余伟列

PHIS: 邵正全经理, 刘东处长, 徐珂'R, 马冰'R

SSDD: 李明植部长, 吴以焕经理/天津三星市场部, 杨真'R

ORION: 洪荣基'R/上海代表处

彩虹: 王昭杰'R

BMCC: 张萍'S

内容:

一、'99.3/4 月产销讯息交换:

99.3/4 月产销信息交换:													
		'99.MAR					'99.APL					'99 计划	3 月 15" 进 口量
		PROD	销售(IN CHINA)			库存	PROD	销售(IN CHINA)			库存		
			总计	外销	内销			总计	外销	内销			
华映	14"	123	99	99	0	92	95	126	126		61	900	
	15"	178	151	151	0	53	162	158			57	2300	280
华飞	14"	81	85	40	45	186	60	80			165	500	
	15"	48	40	10	30	8	50	50			8	900	50
三星	14"	140	120	60	60	95	160	140			115	1000	
	15"	0	0			0	20	15			5	700/5 月始	170
	17"											500/8 月始	
彩虹	15"	62	67	10	57	13	60	63			10	900	
北松	14"	30	32			50	30	20			60	35K/M 至 6 月	
	15"											8 月开始	
大字	14"		50		50		60	6				230	
	15"				60	20	300	60				3800	60
金星	15"				70								70
T.L	14"		386									2580	
	15"		258									4950	630
	17"											500	

RE: '99.3 月 15" CDT 累计于大陆销售量为(258+630)=888K.



说明:

1. 三星电子:

- (1) 深圳三星原计划增加一条 17" CDT 新线, 因资金问题现由 14" CDT 生产线改制, 预计今年 8 月量产. 改线动作将于 5 月开始, 李部长表示, 该生产线将设计为 14"/17" 单向兼容生产线.
- (2) 天津三星于 4 月开始以 SKD 进口 ITC 方式进行 15" CDT 交货, 预计 5 月正式量产.
- (3) 另李部长表示, 其马厂一条 15" CDT 将改产 MINI-NECK 管 (4 月量产); 一条 14" TV 线改为 17" CDT (5 月开始量产).

2. 南京华飞:

- (1) 视 15" 设备到货状况, 预计现有一线 14" CDT 将于 6/E~7/B 改产为 15" CDT, 届时将有二线稼动 15" CDT, 生产线规划为 14"/15" CDT 兼容线, 14" CDT 视库存及市况再决定生产.
- (2) 邵经理称, 由于华飞 15" CDT 量产增加, 台湾部分将适时减产; 预计 '99/B 将移转 2 条 15" CDT 生产线到华飞.

3. 彩虹:

- (1) 与 TSB17" CDT 合作案已基本定案 (资金/立项已完成, 技术合同已在 15" CDT 案进行时完成), 将由现 14" CPT 生产线改制, 整体计划仍未确定.
- (2) 与 '98 年比较, 彩虹 15" CDT 进口料件成本及制程技术均有所降低与提高, 现其电子枪以进口零件组装方式进行, DY 由大陆咸阳偏转及彩东公司提供, 王'R 表示其公司争取 '99 较去年提高产量至约 800~900K, 亏损减少 1/2 水平. (预计 98 年总 COF Loss, 即 Loss 超过 1 亿 RMB)
- (3) 另王'R 表示, 其 15" CDT 产品管面除理 ASC 与 A/G 为同一种产品.

4. 北松:

现其 14" CDT 仍为与 CPT 兼容量产 (1/2 线), 现已定于 8 月开始量 15" CDT, 但是否满线稼动仍未确定; 鉴于 15" CDT 设备亦已到位, 17" CDT 今年应无量产计划.

5. 大宇:

洪'R 表示, 其上海主要系采购 CM, 原以 SKD 方式转口 14" CDT 贸易亦因韩国大宇即将于 5 月停产而停止, 据悉现 ORION 14" CDT 库存约 100K. (三星仍保留给 Soc)

6. '99.8 月起大陆各 CDT-MAKER 量产状况如下:

VENDOR	生产线数	尺寸	产能(K/M)
华飞	2	15"	120
华映(F)	0.5	14"	80
	1.5	15"	240
三星	1(TSDD)	15"	150
	1(SSDD)	17"	100
彩虹	1	15"	80
北松	0.5(暂定)	15"	30
TOTAL (K/M)	14"/80, 15"/630, 17"/100		

三星 15" 生产线 1 条, 产能 150K, 且成品库存尚可.

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## 二、市场讯息交换:

1. 自 5/1 起, 17"CDT 正式调涨 USD5(BASE ON @USD98/MPR2)
2. CM W/W—CHN 需求状况及大陆 15"CDT 内销预计量

表一:

		W/W	CHN
	98	85M	21M (16.5M FOR EXPORT, 4.5M FOR DOMESTIC)
	99	94M	33M (27M FOR EXPORT, 6M FOR DOMESTIC)

表二:

		'98(4.5M)	'99(6M)	RE
14"		1.7M	1M	'99.15"CDT 主要内销量为: CPTF/700K, HF/500K, SDD/500K, LG/500K IRICO/800K, BMCC/100K, T.L:3100K.
15"		2.3M	3.2M	
17"		0.5M	0.8M	

3. 与会者抱怨彩虹 15"CDT 售价已远低于现市场行情(以 64K/ASC, ITC 计, 应为 RMB665), 王'R 解释其 15"(64K/ASC, ITC) 售价现为 RMB630, 此价系与深圳彩虹、威海大字交易价格, 经商定, 为避免该不合理价格波及正常市场价格, 且该两家交易量已占彩虹产量约 90% 产量, 与会者同意这两家因属内部交易(威海与其有 DY 供货交易)之价格, 请其在此两家以外售价调高到市场行情价。(以 64K/MPR2, ITC 计为 @RMB675, 逐级递减 RMB10). 即外销按 @160.65 之最低。
4. 关于北松 14"CDT 售价以 48K/STD, ITC 计现仅为 RMB420~430, 尽管 14" 现售价已底于原定行情(以 STD/K 计仅约 470~480), 但为使 14"CDT 售价有序以避免恶性竞争, 请北松努力 KEEP 售价至 RMB450. SDD/500K 14" 为内销, 价格 470-480 是最低!

## 三、结论:

1. 15"CDT 售价除彩虹与彩皇及威海两家内部交易价外, 其余均需 KEEP 在 @RMB675(以 64K/MPR2, ITC 计, 规格逐级递减量为 RMB10), 另在大陆 15"CDT 与 CM 产销基本平衡情况下, W/W 整体供过于求恐影响 15" 售价之维持。
2. 14"CDT 售价 事实上现已崩盘, 以 STD/K 管计, 现仅约为 RMB470~480(约 USD46, 较行规价低 USD3), 另从 '99.8 月起, 除中华外, 均暂停产 14"CDT(华飞及北松改作 15", 三星改作 17")。
3. 鉴于大陆市场交易特点为较不规范, 尤其是付款及税负问题, 再加上正处于 CM 淡季, 原 CPTF 提议检讨将美金与人民币比率由 10.4 改为 10.6 之动议暂 HOLD, 仍维持 10.4 之计价系数。

此次会议各方代表均表示, 愿意配合中内销差价之不合理处理, 15" 售价未变, 大家同意由外销底价 @160.65 之最低, 14" 为内销, 价格 470-480 是最低。

子/16  
10/16  
5/99  
子/16  
5/99  
5/99

15"  
18k

15"  
18k

15"  
18k

# EXHIBIT 15



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00030752E - CHU00030755.

A handwritten signature in cursive script, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager

Park

Case

#

29567

134 W. 29<sup>th</sup> Street 5<sup>th</sup> Floor • New York, N.Y. 10001  
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D ☐ P ☐ Exhibit 8422  
Deponent Wang  
Date 3/8/19 Rptr SW



## [TRANSLATION]

## Contact Report

Meeting Topic: China *CDT MAKERS* Market Information Exchange

Time: May 6, 1999

Location: Xian

Meeting Attendees: *CPTF*: Manager Jing-Song (Jason) Lu, Wei-Lie Yu  
*PHS*: Manager Zheng-Xi Shao/*TWN*, Si-Quan Li/*HK*, Yi Wang/*HF*.  
*SSDD*: Manager Yi-Huan Wu/Tianjin Samsung Marketing Department, Section Chief Dong-Huang Xu/Shenzhen Samsung, Zhen Yang 'R  
*ORION*: Tae-Sik Kong  
*IRICO*: Manager Wei-Sheng Li, Shao-Jie Wang 'R

## Content:

I. Monthly Production and Sales Information Exchange (*K/M*) for April and May 1999:

		'99 APL					'99 MAY					April 15''
		PROD QTY	Sales (IN CHINA)			Inventory	PROD QTY	Sales (IN CHINA)			Inventory	Import Volume
			Total	Export	Domestic			Total	Export	Domestic		
CPT	14''	88	16	16	0		77	120	100	20	77	
	15''	139	149	133	16	46	155	160	90	73	41	120
Huafei	14''	60	140	50	90	106	60	100			66	
	15''	55	55	0	55	8	55	55			8	70
Samsung	14''	160	150	90	60	105	150	120			135	
	15''	0			20	0	40	20			20	150
IRICO	15''	70	73	5	68	10	63	65			8	
Kitamatsu	14''	28	20			70	10	20-30			50-60	
Daewood	14''			45	0				60			45
	15''			70	0				30			70
LG	15''			70								70
TL	14''	336	416				340	360				45
	15''	264	277				313	300				480

*RE*: Total 15" *CDT* accumulated sales volume in China as of April '99 was (277+480)  
=757K.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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Translation

II. *GLOBAL 14" SALES Q'TY IN APRIL & MAY (K/M)*

	CPT	PHS	SDD	LG	ORION	BMCC	TOTAL
'99 APRIL	220	110	210	40	90	20	690
'99 MAY	190	110	220	0	70	20	610

English words found in the original text are *italicized*.  
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Translation

[Stamped:] *FAX OUT*

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Translator's remarks are indicated in brackets [ ].

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Translation



III. China Production and Sales Comparison (*K/M*) for March to April, 1999

		'99 March	April	May
14"	LOCAL Production	374	336	340
	LOCAL Sales	336	416	360
	Import → <i>CHN</i> Sales	50/ Daewoo	45/ Daewoo	60/ Daewoo
	IN CHN Total Sales	386	461	420
15"	LOCAL Production	288	264	313
	LOCAL Sales	258	277	300
	Import → <i>CHN</i> Sales	630(CPT/280,PHS/50, SDD/170,DW/60,LG/70)	480(CPT/120,PHS/70, SDD/150,DW/70,LG/70)	
	IN CHN Total Sales	888	757	

## IV. Explanation:

## 1. Samsung Electronics:

- (1) Shenzhen Samsung confirmed that the original 14" *CDT* production line will be converted into a 14" and 17" *CDT* single direction compatible production line, and that sales volume for April had increased (+30K), mainly as a result of increase in export orders.
- (2) It was planned that starting as May 1<sup>st</sup>, the *CU* will go from @ *RMB* 20 to @ *RMB* 480 (using a coefficient of 10.4 to calculate @*USD* 46). The planning price for June will be confirmed later.
- (3) Concerning the disposition of *AOC*'s demand about *CDT* prices, in order to maintain the stability of overall *CDT* prices strictly, *SSDD* was advised to refrain from making disturbances that might start another war (especially with respect to *SSDD* ~ *PHS*).

## 2. Nanjing Huafei:

- (1) Huafei indicated: (1) the current 14" *CDT* price is lower than the cost; (2) 14" *CDT* inventory has been reduced; and (3) the effect of *CM* has meant that the production lines for the overall market for 14" will be reduced. It had already made a public announcement of 14" *CDT* price increases in two phases: (1) starting May 1<sup>st</sup>, *CU* @ *RMB*15, and (2) starting June 1<sup>st</sup>, onward, a price increase of *CU* @ *RMB*25, in order to dispel the top management dissatisfaction of *PHS* that 14" sale prices are too low and to respond to the *CU* @ *USD*3 request.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

- (2) Manager Shao indicated that this month 14" *CDT* sales were good because some customers had heard of an imminent price increase and had placed their orders early. These customers were primarily domestic customers. (From my point of view, the increase in *HF* 14" orders is mainly a result of the increasing effectiveness of Chinese anti-smuggling activities. This has caused requirements for *VAT* invoices to increase, which has caused many of *ORION*'s original customers, such as Guangzhou Guangli and Hangzhou Jin Li Pu and other *CM* domestic sales customers to switch their orders).
- (3) It was also indicated that plans will be postponed for the conversion of the other 14" *CDT* line to 15" *CDT* at 6/E ~ 7/B, and replaced with conversion to a 17" *CDT* production line at '99/E. Starting '20/B, 2 to 3 15" *CDT* production lines will be moved from Taiwan to Huafei. Currently, there is one 14" and one 15" production line are kept.
3. IRICO: Requested that IRICO earnestly maintain its 15" transaction prices at the market level of its' customers, with the exception of Weihai Daewoo and Shenzhen Cai Huang, which transaction prices are categorized as intra-group dealings. It also stated that, because the key component *MASK* supply was smooth, 15" *CDT* production volumes increased by about 10K this month.
4. Kitamatsu: At present, the 14" *CDT* inventory is as high as 70K. The actual 15" *CDT* production plan has not yet become clear. During production in May, they will only use up inventory materials for 10K 14".
5. Daewoo: Tae-Sik Kong 'R indicated that production cessation of 14" *CDT* might be postponed to September. 14" *CDT* prices will be CU@USD2 starting 4/E.

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Translator's remarks are indicated in brackets [ ].

#### V. Market Information Exchange

1. Overall sales of 15" *CDT* in China during April were lower than in March. Due to an increase in RMB transactions, the makers should conscientiously maintain their RMB transaction prices starting May 1st.
2. *SSDD/HF/ORION* have increased the 14" *CDT* price in order to bring it closer to the bottom price that had originally been set in discussions. *HF*'s Manager Shao said that he will contact *SDD*'s Department Manager Li by phone to discuss and confirm synchronized action for adjusting the price.

#### VI. Conclusion

1. Due to the initial effectiveness of anti- smuggling activities in China, many previous import channels have been blocked. The requirements of *VAT* receipts for display tubes sold within *CM* China have increased. Since worldwide overall supplies of 14" and 15" *CDT* are still not balanced, the makers should fully use their domestic sales rights to adjust the market supply and demand situation pro-actively and reasonably. Since *SSDD/HF/IRICO* all operate in the *CDT/CPT* business, they have a competitive edge over *CPT* on the comprehensive tax levied on imported materials and parts and do not have any complaints about a RMB - USD exchange rate at a coefficient of 10.4.
2. *HF/ORION* have both delayed their original 14" *CDT* production conversion plans. The worldwide 14" *CDT* production capacity can be basically maintained. Will continue to observe the effectiveness of the *SSDD/HF/ORION* price increase for 14" *CDT*. Now the makers all base on their sales price as standard 15" *CDT* sales price that started May 1st, so as to effectively develop and expand *CPTF* in China's share of the *LOCAL* sales market.
3. Both *HF/SSDD* have proposed their 17" *CDT* development plans in China. With *TSDD/IRICO* 15" *CDT* production capacity further increasing, *LOCAL*ized supply and total domestic sales volume continue to increase day by day, it will gradually become the main size all for which makers compete in the China domestic sales market.
4. The next meeting will be hosted by *SDD* on 6/3. The location will be confirmed later.

- End of Report -

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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After *HQ* complaining and applying pressure to *PHS*' and *SDD*'s top level management, the 14"/15" *CDT* domestic sales price as now rebound. Further watch over *PHS/SDD* to implement the actual target selling price set by the meeting.

Respectfully submitted to the President

[Initialed:] Jing-Song (Jason) Lu, 5/10'99

[Submitted by Signed:] Wei-Lie Yu, 5/1/'99

[Signed:] Fan (A.) Tseng, 5/10 '99

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030755.02E

Translation



## 接洽报告

会议主题: 大陆 CDT MAKER 市场交流

时间: 99/05/06

地点: 西安

与会人员:

CPTF: 吕经理, 余伟列

PHS: 邵正玺经理/TWN, 黎思泉/HK, 王毅/HF

SSDD: 吴~~斌~~焕经理/天津三星市场部, 徐东煜课长/深圳三星, 杨真'R

ORION: 孔泰植

彩虹: 李卫生经理, 王昭杰'R

内容:

一、'99.4/5 月产销讯息交换(K/M):

		'99.APL					'99.MAY					4 月 15"
		PROD	销售(IN CHINA)			库存	PROD	销售(IN CHINA)			库存	进口量
		Q'TY	总计	外销	内销		Q'TY	总计	外销	内销		
华映	14"	88	106	106	0	77	120	120	100	20	77	
	15"	139	149	133	16	46	155	160	90	73	41	120
华飞	14"	60	140	50	90	106	60	100			66	
	15"	55	55	0	55	8	55	55			8	70
三星	14"	160	150	90	60	105	150	120			135	
	15"	0			20	0	40	20			20	150
彩虹	15"	70	73	5	68	10	63	65			8	
北松	14"	28	20			70	10	20-30			50-60	
大宇	14"			45	0				60			45
	15"			70	0				30			70
金星	15"			70								70
T.L	14"	336	416				340	360				45
	15"	264	277				313	300				480

RE: '99.4 月 15" CDT 累计于大陆销售量为(277+480)=757 K.

二、GLOBAL 14" SALES Q'TY IN APRIL &amp; MAY(K/M)

	CPT	PHS	SDD	LG	ORION	BMCC	TOTAL
'99.APRIL	220	110	210	40	90	20	690
'99.MAY	190	110	220	0	70	20	610

FAX OUT

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CHU00030753

## 三、'99.3~4月大陆产、销比较:(k/M)

		'99.3月	4月	5月
14"	LOCAL 产量	374	336	340
	LOCAL 销量	336	416	360
	进口-→CHN 销售量	50/大字	45/大字	60/大字
	IN CHN 总销量	386	461	420
15"	LOCAL 产量	288	264	313
	LOCAL 销量	258	277	300
	进口-→CHN 销售量	630(CPT/280,PHS/50, SDD/170,DW/60,LG/70)	480(CPT/120,PHS/70, SDD/150,DW/70,LG/70)	
	IN CHN 总销量	888	757	

## 四、说明:

## 1. 三星电子:

- (1) 深圳三星确定原 14"CDT 将改为 14"&17"CDT 单向兼容生产线, 4 月销量增加(+30K)主要是其外销订单增加所至。
- (2) 已拟定从 5/1 日起CU@RMB20到@RMB480(以 10.4 系数计折@USD46), 6 月拟价待定。
- (3) 鉴于 AOC 对 CDT 价格要求之秉性, 为彻底维护 CDT 整体价格的有效稳定, 奉劝 SSDD 切勿再搅混水以免再起战事(尤其是对 SSDD-PHS 而言)。

## 2. 南京华飞:

- (1) 华飞表示, 鉴于(1)现 14"CDT 实际售价已属低于成本价格, (2)14"CDT 库存降低, (3)整体 14"市况的生产线已为 CM 界所知将减少效应, 已对外宣称分两阶段调涨 14"CDT 售价为: (1)自 5/1 起CU@RMB15, (2)自 6/1 起CU@RMB25, 以此消除 PHS 上层对其 14"售价过低之不满及达成 CU@USD3要求。
- (2) 邵经理表示, 本月 14"CDT 销售较好系因部分客户闻即将调涨价格而事先订购所至, 而该部分客户主要为内销客户。(依职以为, HF14"订单增加主因系大陆打私活动日趋见效, 对 VAT 发票要求增加, 原 ORION 主要客户如广州广利&杭州金利浦等 CM 内销客户转单所至)
- (3) 另表示原将另一线 14"CDT 于 6/E~7/B 改产为 15"CDT 之计划延后, 取代为将于 99/E 改线为 17"CDT 生产线; 而另将从'20/B 开始自台湾移转 2~3 条 15"CDT 生产线到华飞。即仍现维持 14"/15"生产线各一条。

3. 彩虹: 要求彩虹除与威海大字及深圳彩阜交易价格属内部性质外, 应切实维护与其它家客户的 15"交易价格到市场要求水准。另表示由于关键零件 MASK 供应顺利, 本月 15"CDT 产量较前增加约 10K。

## 4. 北松:

现其 14"CDT 库存高达近 70K, 15"CDT 实际生产计划仍未明确; 5 月仅将库存的约 10K14"料件生产完成。

## 5. 大字:

孔泰植'R 表示 14"CDT 停产将可能推迟到 9 月份进行; 及 14"CDT 价格从 4/E 开始CU@USD2。

## 五、市场讯息交换:

1. 4月较3月15"CDT于大陆整体销量减少,但人民币交易量增加;各家切实从5/1起务必维护人民币交易价格。
2. SSDD/HF/ORION各自调高14"CDT价格以接近原议定的底价水准;HF邵经理表示将于5/13前与SDD李部长电洽,商订调整售价之同一步伐。

## 六、结论:

1. 由于大陆打私活动已初见效果,原进口渠道纷纷受阻,对内销CM所用的显示管之VAT发票要求增加;在14"/15"CDT全球整体供应仍未平衡状况下,各家应充分运用好手中的内销权,以起到主动、合理调整好市场供需局面。但由于SSDD/HF/IRICO系均为CDT/CPT兼营,在主要进口料件所征综合税负方面较CPT有竞争力,对以10.4为美金与人民币计价系数毫无怨言。
2. HF/ORION均延后原14"CDT改线计划,全球14"CDT产能仍基本维持,续观察SSDD/HF/ORION14"CDT价格调涨效应;在目前各家自5/1起统一15"CDT售价基础上,有效拓展CPT于大陆LOCAL内销市场份额。
3. HF/SSDD现均已提出在大陆发展17"CDT计划;在TSDD/IRICO的15"CDT产能进一步提高下,LOCAL化供应及内销总量日渐加强,渐成为各家争夺大陆内销市场的主要尺寸。
4. 另下次会议预订于6/3由SDD主办。地点待定。

~以上报告~

此H&O对PHS及SDD高层抱怨妨碍14"/15"CDT  
内销价格已具阻碍,再确实监视PHS/SDD底价全  
族结论之目标售其。

宋伟 5/10/99

敬呈 侯依理






# EXHIBIT 16

## Filed Under Seal

# EXHIBIT 17

## Filed Under Seal

# EXHIBIT 18

## Filed Under Seal

# EXHIBIT 19



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range: CHU00030797 - CHU00030798.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager

**[TRANSLATION]**

## Contact Report

[Handwritten:] *Copy:* Submit to President to keep and read[Handwritten:] *To:* Section Chief Du 1/2Meeting Main Topic: Mainland China *CDT MAKER* Market Information ExchangeDate: *July.09, 1999*

Location: Fuzhou

Meeting Attendees: *CPTF:* Jing-Song (Jason) Lu, Guang-Hui Dai, Wei-Lie Yu, Zun Chen  
*ORION: JUNG-SAENG PARK*  
*SSDD:* Myoung Sik Lee, Zhen Yang  
*PHS:* Zheng-Xi Shao, Huafei Dong Liu, Si-Quan Li  
*IRICO:* Zhao-Jie Wang, Jun Yao

This Meeting's Topics:

**1. JUNE/JULY Production and Sales Information Exchange****2. Price Review**

[Handwritten:] 2,856,000,-

Content:

**I. JUNE/july Production and Sales Information Exchange***UNIT: K PCS*

	'99 JUNE					'99 JULY					
	PROD.	SALES IN CHINA			STOCK	PROD.	SALES TO CHINA			STOCK	
		TTL	Overseas	Domestic			TTL	Overseas	Domestic		
PHS											
Huafei 14"	83	107	65	42	19	65	70	34	36	14	
15"	71	65		65	9	57	57	4	53	9	
Overseas Factories 15"		50					76				
17"		50					68				
SDD											
SSDD 14"	160	160	140	20	123	0	123	103	20	0	
17"											August B M/P
TSED 15"	80	80	40	40	0	120	120	75	45	0	
Overseas Factories 15"		233									
17"		99									
BMCC 14"	30	27			30	0	22			8	

English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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ORION 14"		30					30				
15"		40					60				
17"		40					20				
IRICO 15"	91	81			25	95	75			45	
CPT											
CPTF 14"	136	153	152	1	90	145	170	170	0	65	
15"	149	180	110	70	25	150 [Circled by hand]	168	92	76	7	
Overseas Factories 14"		12					38				
15"		323					350				
17"		349					350				
14" STL	409	489				210	453				
15" STL	391	1052					906				
17" STL	--	538					438				
14"/15" 17" TTL	800	2079		[Handwritten: "238"]			1797				

Explanation:

1) *CPTF*:

*A)* We explained that among the 90K of the 14" inventory, a considerable number are bare tubes that resulted from the late supply of *DY*.

*B)* All meeting attendees are concerned about the *F* plant's third phase construction plan. We responded that there will be 2 compatible *LINES*: 15"/17" and 17"/19" as planned. Production lines are planned to be transferred from Taiwan.

2) *SDD*: The Shenzhen factory (*SSDD*) 14" *CDT* was converted into a 14"/17" August B M/P compatible line in accordance with plans during the last week of June~July. It is expected that in August,

[Handwritten:] 2/2

*M/P* of 17" can be formally commenced (can supply *TCO TYPE*). In addition, the Tianjin factory (*TSED*) produces 15" *NON TCO TYPE*. Since there are still some quality problems, the estimated production target of June was 120K, the actual figure was only 80K.

3) *PHS*: Among the Huafei production lines, currently only one line is *FOR 14"*, and one line is *FOR 14"/15"* compatible. *It is estimated to convert the 14"/17" compatible line in Q1 next year.* [Italicized in the original text].

4) *ORION*: Its 14" supply *FOR AOC (ONLY)* was 30K/M. In addition, among the 60K 15" sales in July, *AOC/EMC* each occupied about 1/2.

5) *BMCC*: Because of the poor operational efficiency, production of 14" was stopped at 4/E. The inventory is still being digested. It is expected that after the inventory is consumed in July, it is planned in August to bring in some materials then immediately *STOP*.

6) *IRICO*: All 15" productions were 64KHZ *AS TYPE (ONLY)*. The 17" technology comes from *TSB* (it was claimed that a contract has already been confirmed). It is estimated that in 2Q of 2000, *M/P* of 17" *CDT* will formally commence (in Q4 of '99, the 14" *TV LINE* will be used for alteration).

## II. Price Review

A) The price of 14" *IN CHINA* has already been adjusted to *MPRII US\$50*. However, in accordance with the 6/23 *TOP MANAGEMENT*'s resolution, on the basis of a price of *US\$50*, the index for the 14" domestic sales price in *CHINA* will be increased on 8/1 from 10.4 → 10.8, and the price for sales outside of *CHINA* will be *MPRII US\$52*. However, all meeting attendees believed that customers could easily be confused by the \$50/\$52 domestic and overseas prices. Thus, the following pricing plan was unanimously proposed:

EFFECTIVE FROM 8/1		EFFECTIVE FROM 9/1	
14" MPRII US\$50→US\$52	Domestic sales index 10.4	14" MPRII US\$52	Domestic sales index 10.8
15" 64KHZ MPRII Regular customers: US\$65→70 KEY ACCOUNT: US\$62→67	Domestic sales index 10.4		Domestic sales index 10.8

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B) In the 6/23 *TOP MANAGEMENT's* resolution concerning the *BOTTOM PRICE* for the 15'' 8/1 *KEY ACCOUNT*, the *PHS* meeting minutes says *US\$63 →US\$68*. This is not consistent with *CPT's* which is from *US\$62→US\$67*. *PHS* has already confirmed with its headquarters' Manager Xiu-Li Lin that the quotations of each maker to their *KEY ACCOUNTs* are not consistent with, however, they are uniformly increased by *US\$5* from the current price.

III. The next meeting will be organized by Huafei. Time: *AUG 5*. Address: Nanjing.

- End of report - Submitted for approval

Respectfully submitted by Employee Guang-Hui Dai  
*July 9, 1999*

[Initialed:] Jing-Song (Jason) Lu 7/12'99

[Signed:] Afan Tseng 7/12'99

## 接洽報告

會議主題：大陸 CDT MAKER 市場交流

時間：JULY.09,1999

地點：福州

與會人員：

CPTF：呂鏡松、戴光輝、余偉列、陳遵

ORION：JUNG-SAENG PARK

SSDD：李明植、楊真

PHS：邵正璽、華飛劉東、黎思泉

IRICO：王昭杰、姚軍

本次議題：

## 一、JUNE/JULY 產銷訊息交換

## 二、價格檢討

內容：

## 一、JUNE/July 產銷訊息交換

UNIT: K PCS

		'99 JUNE					'99 JULY					
		PROD.	SALES IN CHINA			STOCK	PROD.	SALES TO CHINA			STOCK	
			TTL	外銷	內銷			TTL	外銷	內銷		
PHS												
華飛	14"	83	107	65	42	19	65	70	34	36	14	
	15"	71	65		65	9	57	57	4	53	9	
海外廠	15"		50					76				
	17"		50					68				
SDD												
SSDD	14"	160	160	140	20	123	0	123	103	20	0	
	17"											8 月始 M/P
TSED	15"	80	80	40	40	0	120	120	75	45	0	
海外廠	15"		233									
	17"		99									
BMCC	14"	30	27			30	0	22			8	
ORION	14"		30					30				
	15"		40					60				
	17"		40					20				
IRICO	15"	91	81			25	95	75			45	
CPT												
CPTF	14"	136	153	152	1	90	145	170	170	0	65	
	15"	149	180	110	70	25	150	168	92	76	7	
海外廠	14"		12					38				
	15"		323					350				
	17"		349					350				
14"STL		409	489				210	453				
15"STL		391	1052					906				
17"STL		--	538					438				
14"/15"/17" TTL		800	2079		228			1797				

說明

## 1) CPTF：

A)我方解釋 14"庫存 90K 中有不少係因 DY 供應不及產生之裸管。

B)與會各家關心 F 廠第三期工程計畫。我方回覆以 15"/17"；17"/19"兼容之 2 LINES 規劃。生產線則規劃由台灣移轉。

## 2) SDD：深圳廠(SSDD)14"CDT 依計畫於 6 月最後一週~7 月份改 14"/17"兼容線，預計 8 月

2

始可正式 M/P 17''(可供應 TCO TYPE)。另天津廠(TSED)—生產 15''NON TCO TYPE，因尚有些品質問題，6 月份預計生產目標 120K，實際僅 80K。

- 3) PHS：華飛生產線目前為一線 FOR 14''另一線 FOR 14''/15''兼容。預計明年 Q1 改 14''/17''兼容線。
- 4) ORION：其 14''供應係 FOR AOC(ONLY)30K/M。，另 7 月份之 15''銷售 60K 中 AOC/EMC 約各佔 1/2。
- 5) BMCC：因經營效率差，4/E 即停產 14''，庫存仍在消化中，估計 7 月消化完後擬於 8 月份再進些料即 STOP。
- 6) IRICO：15''生產均屬 64KHZ AS TYPE(ONLY)。17''技術來自 TSB(據稱合同已確定)，預計 2000 年 2Q 始正式 M/P 17''CDT('99 年 Q4 用 14''TV LINE 改)。

## 二、價格討論

- A) 14''IN CHINA 之價位已調至 MPRII US\$50。而依 6/23 TOP MANAGEMENT 決議，在 US\$50 基礎下，14''CHINA 內銷價格自 8/1 起係數由 10.4→10.8，而 CHINA 以外之價格為 MPRII US\$52。惟本次會議之與會各家均認為此易造成客戶對內外銷\$50/\$52 兩個價位之混淆。因此一致建議如下價格方案：

EFFECTIVE FROM 8/1		EFFECTIVE FROM 9/1	
14''MPRII US\$50→US\$52	內銷係數 10.4	14''MPRII US\$52	內銷係數 10.8
15''64KHZ MPRII 一般客戶：US\$65→70 KEY ACCOUNT：US\$62→67	內銷係數 10.4		內銷係數 10.8

- B) 6/23 TOP MANAGEMENT 決議中有關 15''8/1 KEY ACCOUNT 之 BOTTOM PRICE，PHS 之會議記錄為 US\$63→US\$68，與 CPT 之 US\$62→US\$67 不一致，PHS 已與其總部林秀立經理確認各家對 KEY ACCOUNT 報價不一之事實，但統一由現價漲 US\$5。

三、下次會議由華飛主辦。時間：AUG 5。地點：南京。

--以上報告-- 呈核

職 戴光輝 敬呈  
JULY.9, 1999

# EXHIBIT 20



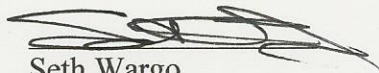
STATE of NEW YORK     )  
                                      )  
COUNTY of NEW YORK    )

SS:


**CERTIFICATE OF ACCURACY**

This is to certify that the attached document, "SDCRT-0086672 – SDCRT-0086674", originally written in *Korean*, is to the best of our knowledge and belief, a true, accurate and complete translation into *English*.

Dated: November 4, 2013

  
Seth Wargo  
Consortra Translations

Sworn to and signed before ME this  
4th day of November,  
2013.

  
Notary Public

JAMES G MAMERA  
Notary Public, State of New York  
No. 01MA6157195  
Qualified in New York County  
Commission Expires Dec. 4, 2014

Your  
legal  
translation  
partner 

## 해외출장 경비 정산서

(일반)

보고서확인부서

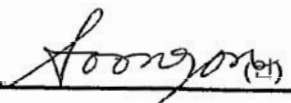
입안	심의	결정
이순곤	송인환	송인환

출장자	부서: CDT판매팀장 급호: B3B-01 직위: 주임 성명: 이순곤 직원번호: 9611542					
출장지	대 만		<input type="radio"/> A지역 <input checked="" type="radio"/> B지역 <input type="radio"/> C지역			
출장기간	1998년07월14일 - 1998년07월18일 (4박5일)					
출장목적	7월 ORDER 협의 및 19" T/R 입회					
출장여비발생내역						
구분	내역	화폐	현지화	환율	금액(원)	
교통비	해외출장시 시니19980714 버스 본사 김포공항	KRW	0.00	0.00	5,000	
교통비	해외출장시 시니19980715 택시 대만사무소 필립스	NTD	1,200.00	39.50	47,400	
교통비	해외출장시 시니19980716 택시 대만사무소 필립스	NTD	1,200.00	39.50	47,400	
교통비	해외출장시 시니19980718 버스 대만사무소 CKS AIRPORT	NTD	120.00	39.50	4,740	
숙박비	숙박비 정산	USD	420.00	1,350.02	567,008	
일당	일당 정산	USD	250.00	1,350.02	337,505	
사용	공항사용료	NTD	300.00	39.50	11,850	
항공료	SEL-TPE	KRW	0.00	0.00	384,000	
합계					1,404,903	

1998년 08월 01일

상기 금액을 정히 영수함.

성명: 이순곤



98000001



## China Same Industry Meeting (August)

- ☐ Time: August 5, 1999
- ☐ Place: Hyunmu Restaurant in Nanjing, China
- ☐ Participants:
- PHILIPS: Su Hwa Lee, FRANK, Young Ma, Dong Yoo, Sa Chun illegible
  - IRICO: Ui Seng Lee, Mr. Sa, So Kul Wang Chinese: Zhaojie Wang
  - SSDD: Myung Sik Lee, Jin illeible
  - ORION: Jung Seng Park, Myung Hak Oh
  - CPT: C.C. LIU, Kyung Song, illegible, Ui Yul Seo
  - BMCC: Shin Moon Hwang

☐ Major contents

1. Special lecture by MR. C.C.LIU (CPT headquarters administrator)

- 1) The industry meetings should remain confidential considering the international regulation of antitrust laws
- 2) F/UP on China regarding the top meeting decision
- 3) Discussions focused on 14"/15" prices

July PSI for each company and August plan (Refer to Attachment 1 for details)

- PHILIPS: 14" 17" to take place next February, production expected in March (14/17" dual)
- CPT: 2 17" lines expected in August and September of next year
  - ☞ Current domestic customers: AOC, PHILIPS, EMC, AND ACER
- IRICO: 17" production to start the year after next year
  - 15" MAX CAPA = 120K/M (P + F + DY domestic production)
- BMCC: 14" expected to resume in September
- ORION: 14"/15" AOC sales decrease

2. Production of monitors in China in the 1<sup>st</sup> half of '99 (Refer to Attachment 2)

3. Price issues (based on MPR II): bottom price for key accounts

SIZE	August		September	
	Export price	Domestic price	Export price	Domestic price
14"	\$52	RMB540	\$52	RMB561
15"	\$68	RMB707	\$68	RMB illegible
17"	\$93	RMB967	\$93	RMB 1,004

Highly Confidential

Subject to Protective Order

U.S.D.C. (N.D. Cal) No. M-07-5944 SC

In re Cathode Ray Tube (CRT) Antitrust Litigation

FINAL TRANSLATION

SDCRT-0086672E\_Translation

☐ Attachment 1 PSI and August Plan for companies

Customer	SIZE	July					August					Remarks
		Production		Sales		Inventory	Production		Sales		Inventory	
		Total	Domestic	Export	Total		Domestic	Export				
PHS	14"	65	82	50	32	2	65	65	45	20	2	
	15"	57	63	63		3	61	62	62		2	
	15" *		121		121			90		90		
	17" *		72	40	32			80	30	50		
CPT	14"	148	181	10	171	57	160	176	10	166	41	
	14" *		50		50			70		70		
	15"	159	161	76	85	25	160	159	65	94	26	
	15" *		406		406			348		348		
	17" *		416		416			482		482		
BMCC	14"	0	27	27		8				1	7	
	15"			87								
IRICO	15"	80.5	87			18.5	85	80	80		23.5	
ORION	14" *		10		10			20		20		14" reduced
	15" *		30		30			70		70		
	17" *		25		25			30		30		
SDD	14"		123	40	83		165	165	55	110		
	15"	120	120	50	70		150	150	70	80		
	15" *		230		230			230		230		
	17" *		230		230			230		230		
	17" (SKD)	10				10						
LG	14" *											
	15" *											
TTL	14"	213	413	127	286	67	390	406	110	297	50	
	14" *	0	60	0	60	0	0	90	0	90	0	
	15"	416.5	431	276	155	46.5	456	451	277	174	51.5	
	15" *	0	787	0	787	0	0	738	0	738	0	
	17" *	10	743	40	703	10	0	822	30	792	0	

Asterisk: Non-originating monitors

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☐ Attachment 2 Monitor production in China in the 1<sup>st</sup> half of '99

NO	品名	14"	MAIN	15"	MAIN	17"	MAIN	19"	MAIN	TTL
1	AOC	650	C/P/O	880	C/P/O	467	L/P/C	28		3,025
2	EMC	285	S/C	800	S/C	450	S/C	70		1,405
3	LITE-ON	137	C	510	C	663	C	1		1,311
4	PHS(金華)	238	P	557	P/C	394	P/C	1		1,190
5	ADI	210	S	730	S/T	110	H/T	0		1,050
6	COMPAL	11	C	398	C/S	345	C/S	0		752
7	MFG	0		367	S	166	T/H	7		540
8	TSED	55	S	410	S/T	60	S/T	0		525
9	MAG	20	S	230	S/SY	230	T/SY/S	0		480
10	ROYAL	0		0		410	L/TE	13	L	423
11	ACER	91	P/C	237	P/C/S	79	P	0		407
12	PHS(華中)	35	C/P	193	C	155	C/M	0		384
13	IRICO	50	P	280	I/P	20	P/C	2		352
14	DELTA	0		89	T	250	S/C/L	10		320
15	CGC	145	S/P/B/L	100	L/P	0		0		245
16	DAEWOO(W)	40	S	194	I/S	6	S	0		240
17	Q-RUN	10	S	78	C/S	139	C/S	7		234
18	K-TRON	170	C	29	C	3	C	0		202
19	FIC	15	S/C	100	L	60	L/P/C	5		180
20	GVC	20	S	65	S/C/L	17	L/C	0		150
21	SP-T	45	S	79	S/C	0		0		145
22	XOCECO	60		0	S/L	20	C	0		145
23	KFC	8	P	40	S/C	41	L	0		128
24	WESTLAKE	0	L	80		110	MIT			110
25	T-SOMA	60	P	40	P	0		0		100
26	LG(TONTRU)	10	L	80	L	10	L			100
27	FOUNDER	50	B/P	40	I/P	0				90
28	JIANSONG	0		78	C	0				78
29	KTC	60	B/S	10	I	0				70
30	ESAI	47	S	18	S/I	2	S			67
31	HEMC	12	S	53	S	0				65
32	LIRON	30	S	30	L/S	0				60
33	DTS	40	P	20	P	0				60
34	LANGUANG	40	O/P	15	L	0				55
35	YUAN ZIN	10	S	22	L	17	L			49
36	COVEFORD	15		15		12				42
37	BIGHTIDE	0		35	P	0				35
38	GUANLI			24		0				
39	OTHERS	20		10		2				32
TOTAL		2,690		6,798		4,238		144		13,870
%		18%		49%		30.56%		1.04%		

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\* S→SDD, C→CPT, P→PHILIPS, B→BMCC, O→ORION, T→TOSHIBA, L→LG,  
MIT→MITSUBISHI, M→MASUSHITA, H→HITACHI, TE→TECO

3/3

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U.S.D.C. (N.D. Cal.) No. M-07-5944 SC  
In re Cathode Ray Tube (CRT) Antitrust Litigation  
FINAL TRANSLATION

SDCRT-0086674E\_Translation

## 중국 동업계 Meeting (8월)

☐ 時 間: 1999/08/05

☐ 場 所: 中國 南京, 玄武大酒店

☐ 參席人員:

-PHILIPS 李修華, FRANK, 馬冰, 劉東, 魏思泉

-IRICO 李衛生, MR.沙, 王昭杰

-SSDD 李明植, 楊眞

-ORION 朴正生, 吳明學

-CPT C.C.LIU, 呂鏡松, 余偉列

-BMCC 黃新文

☐ 主要 內容

### 1. MR. C.C.LIU (CPT 본사 업무처장) 특강

- 1) 독과점 금지의 국제 법규를 고려, 동업계 Meeting 비밀 유지
- 2) Top Meeting 결정에 대해 중국대륙 F/UP
- 3) 14" / 15" 가격 중점 논의

### 2. 7월 업체별 PSI 및 8월 계획 (상세 내용 첨부1 참조)

- PHILIPS: 14" → 17" 내년 2월 개조, 3월 생산 예정(14/17" 겸용)
- C P T : 17" 2 Line 내년 8~9월 예정
  - ☞ 현재 내수판매처; AOC, PHILIPS, EMC, ACER
- IRICO : 17" 생산 내년이후로 연기
  - 15" MAX CAPA = 120K/M (P +F +DY 국산화)
- BMCC : 14" 9월 재개 예정
- ORION : 14"/15" AOC 판매 감소

### 3. '99 상반기 중국 MONITOR 생산 실적 (첨부 2 참조)

### 4. 가격문제(MPR II 기준); Bottom Price For Key Account

SIZE	8월		9월	
	수출가	내수가	수출가	내수가
14"	\$52	RMB540	\$52	RMB561
15"	\$68	RMB707	\$68	RMB780
17"	\$93	RMB967	\$93	RMB1,004

1/3

## □ 첨부 1. 7월 업체별 PSI 및 8월 계획

거래선	SIZE	7월					8월					비고
		생산	판 매			재고	생산	판매			재고	
			총계	내수	수출			총계	내수	수출		
PHS	14"	65	82	50	32	2	65	65	45	20	2	
	15"	57	63	63		3	61	62	62		2	
	15" *		121		121			90		90		
	17" *		72	40	32			80	30	50		
CPT	14"	148	181	10	171	57	160	176	10	166	41	
	14" *		50		50			70		70		
	15"	159	161	76	85	25	160	159	65	94	26	
	15" *		406		406			348		348		
	17" *		416		416			482		482		
BMCC	14"	0	27	27		8				1	7	
	15"			87								
IRICO	15"	80.5	87			18.5	85	80	80		23.5	
ORION	14" *		10		10			20		20		14" 감소
	15" *		30		30			70		70		
	17" *		25		25			30		30		
SDD	14"		123	40	83		165	165	55	110		
	15"	120	120	50	70		150	150	70	80		
	15" *		230		230			230		230		
	17" *		230		230			230		230		
	17" (SKD)	10				10						
LG	14" *											
	15" *											
TTL	14"	213	413	127	286	67	390	406	110	297	50	
	14" *	0	60	0	60	0	0	90	0	90	0	
	15"	416.5	431	276	155	46.5	456	451	277	174	51.5	
	15" *	0	787	0	787	0	0	738	0	738	0	
	17" *	10	743	40	703	10	0	822	30	792	0	

표시는 역외산 의미함

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## □ 첨부 2. '99 상반기 중국 MONITOR 생산 현황

NO	고객	14"	MAIN	15"	MAIN	17"	MAIN	19"	MAIN	TTL
1	AOC	650	C/P/O	880	C/P/O	467	L/P/C	28		2,025
2	EMC	285	S/C	600	S/C	450	S/C	70		1,405
3	LITE-ON	137	C	510	C	663	C	1		1,311
4	PHS(소주)	238	P	557	P/C	394	P/C	1		1,190
5	ADI	210	S	730	S/T	110	H/T	0		1,050
6	COMPAL	11	C	396	C/S	345	C/S	0		752
7	NPG	0		367	S	166	T/H	7		540
8	TSED	55	S	410	S/T	60	S/T	0		525
9	MAG	20	S	230	S/SY	230	T/SY/S	0		480
10	ROYAL	0		0		410	L/TE	13	L	423
11	ACER	91	P/C	237	P/C/S	79	P	0		407
12	PHS(동관)	36	C/P	193	C	155	C/M	0		384
13	IRICO	50	P	280	I/P	20	P/C	2		352
14	DELTA	0		60	T	250	S/C/L	10		320
15	CGC	145	S/P/B/O/L	100	L/P	0		0		245
16	DAEWOO(W)	40	S	194	I/S	6	S	0		240
17	Q-RUN	10	S	78	C/S	139	C/S	7		234
18	K-TRON	170	C	29	C	3	C	0		202
19	FIC	15	S/C	100	L	60	L/P/C	5		180
20	GVC	20	S	65	S/C/L	17	L/C	0		150
21	SP-T	45	S	79	S/C	0		0		145
22	XOCECO	60		0	S/L	20	C	0		145
23	KFC	8	P	40	S/C	41	L	0		128
24	WESTLAKE	0	L	80		110	MIT			110
25	T-SOMA	60	P	40	P	0		0		100
26	LG(TONTRU)	10	L	80	L	10	L			100
27	FOUNDER	50	B/P	40	I/P	0				90
28	JIANSONG	0		78	C	0				78
29	KTC	60	B/S	10	I	0				70
30	KSAI	47	S	18	S/I	2	S			67
31	HEMC	12	S	53	S	0				65
32	LIKON	30	S	30	L/S	0				60
33	DTS	40	P	20	P	0				60
34	LANGUANG	40	O/P	15	L	0				55
35	YUAN ZIN	10	S	22	L	17	L			49
36	COVEFORD	15		15		12				42
37	BIGTIDE	0		35	P	0				35
38	GUANLI			24		0				
39	OTHERS	20		10		2				32
TOTAL		2,690		6,798		4,238		144		13,870
%		19%		49%		30.56%		1.04%		

99000182

\* S→SDD, C→CPT, P→PHILIPS, B→BMCC, O→ORION, T→TOSHIBA, L→LG,  
MIT→MITSUBISHI, M→MASUSHITA, H→HITACHI, TE→TECO

3/3

# EXHIBIT 21



June 20, 2012

**Certification**

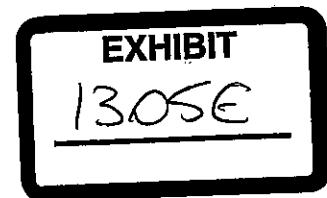
**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00030819E - CHU00030822E.

A handwritten signature in cursive script, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager



Park

Case

#

29567



[TRANSLATION]

'99-08-10 10:02

T-556 P01

Visitation Report

[Handwritten:]

1/4

To be received by Manager Lu

*Sales* circulate and read ↓

Submitted for approval

→ Tony Each officer

Yu Chen 8/10/99

Jiang 8/10'99 Hua Wu 8/10-99 Ji 8/10'99

Meeting Topic: Mainland China CDT Market Exchange

Date: 99/08/05 Location: Nanjing

Meeting Participants:

CPTF: Director Liu, Manager Lu, Wei-Lie Yu

SDD: Myoung Sik Lee, Department Head; Zhen Yang

BMCC: Manager Xin-Wen Huang

ORION: Jung Saeng Park

IRICO: Manager Wei-Sheng Li, Zhao-Jie Wang

PHS: Manager Zheng-Xi Shao/*TWN*, Xiu-Hua Li/*HF*,  
Si-Quan Li/*HK*, Dong Liu/*HF*

Content:

- I. *JULY/AUG* Mainland China CDT Production and Sales Information Exchange  
(see Attachment 1)

Explanation:

1. SDD:

- A. Shenzhen Samsung will perform adjustments to its 14" CDT production line in '99.7 to achieve 14" and 17" CDT compatible mass production. For this reason, it only mass produced 17" CDTx10K units in July. Sales were only of the 14" CDTx123K in existing inventory.
- B. Tianjin Samsung's 15" CDT mass production capacity increased relatively quickly, with 30K in May, 80K in June, 120K in July, and 150K units in August (forecasted). Additionally, it denies allegations in the market that inferior tubes were sold during the initial phase of mass production.
- C. Due to strong sales during the 14" CDT peak season, and the fact that 17" has been in a low-prices status, Shenzhen Samsung changed the original plan for mass production of 17" CDT to production of 14" CDT, and stated that because of

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030819.01E

Translation

changes to production lines, the original level of production efficiency had been affected. For this reason, in August, it is estimated that only 14" *CDT*×150K will be mass produced, and that there will be no means of reaching around 200K.

- D. SDD also indicated that it had provided 16" *CDT*×20K to *EMC* during the first half of the year. SEC was also responsible for part of the demand. *SDD* engages in compatible production of 15" *CDT* and 16" *CDT* in Korea, and at present, is expanding in the market (approximately 10K/M).

2. *IRICO* (*IRICO*):

- A. Mass production volume of 15" *CDT*×95K was originally planned for July. Due to inadequate supply of imported materials, however, the current actual mass production volume is approximately 85K.
- B. At present, 45% of *Irico*'s material requirements for mass production of 15" *CDT* are supplied to *LOCAL* – including *BULB/DY/GUN/COATING*. The production capacity is designed for 120K/M.
- C. It is confirmed that there are no plans for 17" *CDT* mass production in 1999, and that in the 1<sup>st</sup> *HALF* of '20, the conversion from 14" *CPT* production will be completed.

3. *ORION*:

- A. At present, the main sales targets for 15" *CDT*'s are Mainland China's *AOC/EMC*, as well as certain small customers.
- B. In spite of strong demand for 14" *CDT* in the market, only 10~20K 14" *CDT*'s were delivered to *AOC* in July and August. They could not provide any rational or satisfactory explanation for this.
- C. It was also confirmed that 14" *CDT* production will be stopped in September. All production will be focused on mass production of 15" (*MINI*) *CDT*.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00030819.02E  
Translation



'99-08-10 10:02

T-556 P02

[Handwritten:] To be received by Manager Lu

[Illegible]4

4. *BMCC* (BMCC)

- A. In May this year, production of 14" *CDT* was stopped. In July, only 27K units from existing inventory were sold. 8K light tubes from inventory were sold to Matsushita Philippines as part of internal transactions (1K/M).
- B. It is expected that after September, further consideration will be given to production of 14" *CDT*. The main reasons are that (1) The current 14" price is increasing; (2) There are still parts of unmatched materials remain in inventory; (3) Matsushita Japan will *CD* prices with material makers in order to increase competitiveness.

II. Price *ISSUE*:14"/15"/17" Prices (*USD/RMB*) Review Below:

	8/01 (Effective, Index: 10.4)		9/01 (Effective, Index: 10.8)	
	USD	RMB	USD	RMB
14"	52	540	52	561
15"	68	707	68	730
17"	93	967	93	1004

*Remark:*

- (1) Department Head Li of Shenzhen Samsung has frankly admitted that the price quoted to *EMC* for 14" *CDT* is less than *USD52 (MPR2)* and additionally stated that the price for Taiwanese makers is determined by *SDD*.
- (2) Because of the current *CDT* supply and demand situation, meeting participants decided to implement the *CDT* prices in the table above. If transactions are not with key customers, consideration must be given to increase prices on the basis of the prices listed above.
- (3) The main *CM* manufacturers are *TWN/KOREA/MAINLAND*. If any unfair *CDT* price changes occur (for example, Taiwan makers *CDT* ~ Taiwan makers *CM*; Korean makers *CDT* ~ Korean makers *CM*), a shift in *CM* orders will be inevitable. On the basis that further clarification is still required of the current market situation, whether or not 14" and 15" *CDT* prices can again be *CU USD2/PC (Index: 10.8, Effective 10/01)* [Underlined by hand] will be separately re-determined.
- (4) All the makers will finish sending notification of the above prices to customers next week (8/09 ~13).

English words found in the original text are *italicized*.  
 Translator's remarks are indicated in brackets [ ].

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CHU00030820.01E  
 Translation

III. Mainland China *CM* Production Demand and Production Volume for '99. (1~6)  
(See Attachment 2)

IV. The next *CDT* meeting is projected to be convened on 9/02 by IRICO

~ End of report ~

[Handwritten:]

The location has not yet been confirmed. Use the IRICO visit as an opportunity to attend China *CRT Meeting*. In the beginning, representative *management* [Illegible].

1. Confidential nature of meeting: (On location were *CRT meeting* seating labels. Reporters saw and asked to interview. Already ordered to [Illegible])
2. Fully actualize headquarters' decision: The past half year and before China area has not been able to carry out each maker's decision. Has to [Illegible].
3. Price: 8/1 14" add \$2; 15" add \$5; domestic sales multiply by 10.4. 9/1 domestic sales multiply by 10.8. Absolutely cannot reduce price.

[Handwritten:] Submit to Manager

[Initialed:] Chieng-Yuan (C.Y.) Lin 8/9

[Initialed:] Chih-Chun (C.C.) Liu 8/9

[Initialed:] Chen-Cheng (Tony) Chien 8/9

[Signed:] Submitted by Wei-Lie Yu 8/9'99

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030820.02E

Translation

'99-08-10 10:03

T-556 P04  
[Handwritten:] 4/4

[Handwritten:] Attachment 2

## 99(Jan – Jun) Main CM output

Unit: Kpcs

	14"		15"		17"		19"		Total
AOC	650	c	880	c	467	l	28		2025
EMC	285	s	600	s/c	450	s	70		1405
Lite-on	137	c	510	c	663	c	1		1311
PH(sz)	238	p	557	p/c	394	p/c	1		1190
ADI	210	s	730	s/t	110	h/t	0		1050
Compal	11	c	369	c/s	345	c/s	0		752
NPG	0		367	s	166	t/h	7		540
TSED	55	s	410	s/t	60	s/t	0		625
MAG	20	s	230	s/sony	230	t/sony/s	0		480
IRICO	50	p	280	i/p	20	p	2		352
FIC	15	s/p	100	l	60	l	5		180
Royal	0		0		410	l/te	13	l	423
Acer	91	p/c	237	p/c/s	79	p	0		407
PHS(dg)	36	c/p	193	c	155	c/mec	0		384
Delta	0		60	t	250	s/c/l	10		320
DW	40	s	194	l/s	6	s	0		240
Q-run	10	s	78	c/s	139	c/s	7	s	234
CGC	145	s/p/b/o/l	100	l/p	0		0		245
K-tron	170	c	29	c	3	c	0		202
SP-T	45	s/c	100	s/c	0		0		145
T-Soma	60	p	40	p	0		0		100
GVC	20	s	113	s/c/l	17	l/c	0		150
Xoo	60	s	65	s/l	20	c	0		145
KFC	8	s	79	s/c	41	L	0		128
West Lake	0		0		110	MIT			110
LG(Tontru)	10	l	80	l	10	l			100
Founder	50	b/p	40	l/p	0				90
Jiansong	0		78	c					78
KTC	60	b/s	10	I					70
KSAI	47	s	18	s/I	2	s			67
HEMC	12	s	53	s					65
LIKON	30	s	30	l/s					60
Languang	40	o/p	15	l					55
Yuanzin	10	s	22	l	17	l			49
DTS	40	p	20	p					60
Bigtide			35	p					35
Coverford	15		15		12				42
Guanli			24						24
Others	20		10		2				32
total	2690		6798		4238		144		13870
percent	19.39%		49.01%		30.56%		1.04%		100.00%

English words found in the original text are *italicized*.  
 Translator's remarks are indicated in brackets [ ].

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CHU00030821E

Translation

'99-08-10 10:03

T-556 P03

[Handwritten: ] To be received by Manager [Illegible]

[Illegible]4

[Handwritten:] Attachment 1 99.													
July							'99. August						
	Type	STORE	PROD	SALE			STORE [Handwritten: "7/ES"]	PROD	SALE			STORE [Handwritten: "8/E"]	REMARK
				TTL	Local Sales	Export Sales			TTL	Local supply	Export Sales		
Philips	14" (Local)		65	82	50	32	2	65	65	45	20	2	
	15" (Local)		57	63	63		3	61	62	62		2	
	15" (Import)			121		121			90		90		
	17" (Import)			72	40	32			80	30	50		
CPT	14" (Local)		148	181	10	171	57	160	176	10	166	41	
	14" (Import)			50		50			70		70		
	15" (Local)		159	161	76	85	25	160	159	65	94	26	
	15" (Import)			406		406			348		348		
	17" (Import)			416		416			482		482		
BMCC	14" (Local)		0	27	27		8				1	7	
	15" (Local)												
IRICO	15" (Local)		80.5	87	87		18.5	85	80	80		23.5	
ORION	14" (Import)			10		10			20		20		
	15" (Import)			30		30			70		70		
	17" (Import)			25		25			30		30		
SDD	14" (Local)			123	40	83		165	165	55	110		
	15" (Local)		120	120	50	70		150	150	70	80		
	15" (Import)			230		230			230		230		
	17" (Import)			230		230			230		230		
	17" SKD		10				10						
LG	15" (Import)												
	14" (Import)												
Total	14" (Local)	0	213	413	127	286	67	390	406	110	297	50	
	14" (Import)	0	0	60	0	60	0	0	90	0	90	0	
	15" (Local)	0	416.5	431	276	155	46.5	456	451	277	174	51.5	
	15" (Import)	0	0	757	0	757	0	0	668	0	668	0	
	17" (Import)	0	10	743	40	703	10	0	822	30	792	0	

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030822E

Translation

# EXHIBIT 22

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# EXHIBIT 23

## Filed Under Seal

# EXHIBIT 24

## Filed Under Seal

# EXHIBIT 25

## Filed Under Seal



# EXHIBIT 26

## Filed Under Seal

# EXHIBIT 27

## Filed Under Seal

# EXHIBIT 28

## Filed Under Seal

# EXHIBIT 29

## Filed Under Seal

# EXHIBIT 30

## Filed Under Seal

# EXHIBIT 31

## Filed Under Seal

# EXHIBIT 32



June 20, 2012

**Certification**

**Park IP Translations**

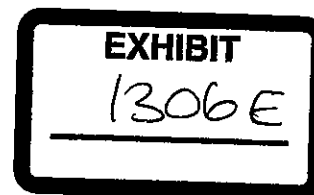
This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00030992E - CHU00030994E.

A handwritten signature in black ink, which appears to read 'Abraham I. Holczer'. The signature is fluid and cursive.

---

Abraham I. Holczer

Project Manager





[TRANSLATION]

[Handwritten:] [Illegible], Yu

*CPTF* Sales Department Visitation Report

Meeting Main Topic: China *CDT* Market Exchange

Time: '00/04/06

Location: Xiamen

Meeting Attendees:

*CPTF*: Manager Jing-Song (Jason) Lu, Wei-Lie Yu *SDD*: Department Manager Myong Sik Lee, Team Leader Zhen Yang, Xiao-Mei Yu's/*SSDD*

*IRICO*: Zhao-Jie Wong *BMCC*: Manager Xin-Wen Huang *LG*: Zong-Wen Park  
President/Shenzhen Office

*PHS*: Manager Zheng-Fu Tian/*TWN*, Director Dong Liu/*HF ORION*: Myong Doek Pak,

Content:

I. '00. [Handwritten: "*Mar-Apr*"] China *CDT* Production Sales and Inventory Data  
Exchange (as in attachment 1).

II. Explanation

1. *SDI*:

- Currently, the domestic and external sales of the 15" *CDT* produced in China are about 45% and 55% each. BenQ is the main 17" *CDT* domestic sales customer.
- Originally, the Shenzhen *SDI* factory already verified and approved the 4*L* color tube production lines, with 2*L* already being utilized. It will decide in the near term if it will increase 17"/19" *CDT*x1*L* in year '01.
- Tianjin *SDI* actually stopped production for 9 days in March. This month, Shenzhen *SDI* also was listed into a plan to stop production for 5 days. Department Manager Lee indicated that he needed to verify it with headquarters again. According to his understanding, the plan only referred to the stopping of the 17" *CDT* mass production, to avoid affecting 14" *CDT*'s normal production.

2. *PHS*:

- Originally, Taiwan's 15"x3*L* would reach Nanjing bit by bit for installation starting 4/*M*. Because part of the equipment has shared usage, these 3*L* will simultaneously start utilization for mass production in September (14"/15"x1*L*;15"x2*L*). The existing 2*L* will be adjusted to 14"-17" shared lines.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030992.01E  
Translation

- Manager Tian indicated that up to 3/E, the 15"/17"CDT inventory was each about 400-500k. He estimated that the heating of the entire market will start in June.

3. *IRICO* (IRICO):

- Under the circumstances of preserving existing customers, because customer quality is not good and there is still no new market, the entire inventory still remains high.
- The situation of the joint venture with *TSB* 17"CDT is now temporarily lined up to be completed in Q4, but it still can be delayed until Q1 of next year. The ratio of the joint venture with *TSB* is 51:49. [Handwritten: "Production line is still being moved over from Japan."]

4. *ORION*:

- The current production line set up is 14"/15"minix1L (C'TY:140-150k/M). Of which, 14"x40k, 15"x90-100k; 15"Normalx1L (C'TY:160k/M); 17"CDTx2.5L (C'TY:250k/M); 19"CDTx0.5L (C'TY:20k/M).

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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Translation

- Mainly delivered to *AOC* (around 40k/M), the *Mini* tube makes up more than 1/2 of the current 15" *CDT* monthly average delivery to China.
- Estimates are that the joint venture with Xincheng [Underlined by hand] [Handwritten above: "(Kunshan)"] China will be utilized for mass production in Q1 of next year 15"/17" *CDT* x 1L (*C'ty*: 150k/M). [Handwritten: "but it was claimed that the Xincheng financial area is problematic. This plan is already temporarily *PENDING*."] )

5. *LG*:

- About a monthly average of 50k 15" *CDT* are sold to Taiwan makers. The main China local customers are XOCOCO/China Great Wall Computer Co/Founder (Combined calculation is about 20k/M). About 120k/M 17" *CDT* are now delivered to Taiwan makers, of which about 50-60k/M are delivered to *AOC*.
- The March average *LG* 15"/17" production volume was about 600k each. The inventory in 3/E was about 310k/250k. Estimates for the April production volume are 600k/560k. The inventory for 4/E was each about 380k/250k.

6. *BMCC (BMCC)*: After it had been verified that starting in April, the direction is for Matsushita Philippines to produce 14" *CDT* x 10k, temporarily there is no following *CDT* mass production plan. The original 17" *CDT* expansion situation is still *pending*.

III. Price Review:

1. Meeting attendees agreed still temporarily to maintain the U.S. dollar and RMB pricing coefficient as 10.8, ~~only actual current market coefficient already at about 10.4~~ [Crossed-out by hand].
2. In light of the pending global glass *shortage* situation, especially influenced by the large screen and flat tube's increasing demand, 14" *CDT* glass will be more lacking. In anticipation of future price *CU*, Huafei Color Display Systems/SDI both suggested reviewing a price increase for the 14" *CDT*. Simultaneously, this can create a price *CU* environment for later price adjustments. They requested headquarters to consider it.

IV. The next *CDT* meeting will tentatively be on 05/09 PM 2:30, held by HuaFei Color Display Systems.

~End of report~

[Handwritten:]

*SDI* still questioned if *CPT* gave preferential pricing to *AOC*, to which employee already determinedly denied. *SDI* also brought up that there should be a price increase for the 14" *CDT* because its demand exceeds its supply. Employee replied that it must be

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Translator's remarks are indicated in brackets [ ].

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Translation

decided and passed through the headquarter *GLASS MEETING*. There is optimism for success.

Submit Team Leader

Manager

Respectfully submit to *CPTF* President Y.M. Peng

Sales Department Manager/Director Cheng

[Initialed:] Y.M. Peng *APR 11/2K*

[Initialed:] Jason (Jing-Song) Lu 4/10 '00

[Signed:] Wei-Lie Yu 4/10'2K

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030993.02E  
Translation

	Type	Prod	'00.03.Sale			E/stock	Prod	'00.04.Sale			E/stock	Remark
			Ttl	Local.sa	Export.sa			Ttl	Local.sa	Export.sa		
Philips	14"(Local)	95	94	58	36	1	80	80	32	48	1	
	15"(Local)	85	85	66	19	8	80	82	65	17	6	
	15"(Import)		56		56			60		60		
	17"(Import)		89		89			98		98		
Sdd	14"(Local)	160	158	65	93	4	160	164	70	94	0	
	14"(Import)											
	15"(Local)	130	120	54	66	24	130	150	68	82	4	
	15"(Import)		160		160			180		180		
	17"(Local)	50	55	10	45	0	50	50	10	40	0	
	17"(Import)		170		170			200		200		
Cpt	14"(Local)	181	173	91	82	17	218	226	0	226	9	
	14"(Import)		102		102			111		111		
	15"(Local)	160	118	44	74	85	82	142	93	49	25	
	15"(Import)		160		160			210		210		
	17"(Import)		350		350			550		550		
Orion	14"(Import)		34		34			40		40		
	15"(Import)		71		71	0		83		83	0	
	17"(Import)		0		0	0		6.7		6.7	0	
Bmcc	14"(Local)											
Irico	15"(Local)	83	80	80		184	85	85	85		184	
Lg	14"(Import)		0									
	15"(Import)	0	80		80			80		80		
	17"(Import)	0	170		170			170		170		
Total	14"(Local)	436	425	214	211	22	458	470	102	368	10	
	14"(Import)		136	0	136			151	0	151		
	15"(Local)	458	403	244	159	301	377	459	311	148	219	
	15"(Import)		527	0	527			613	0	613		
	17"(Local)	50	55	10	45	0	50	50	10	40	0	
	17"(Import)		779	0	779			1024.7	0	1024.7		

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00030994E  
Translation

# EXHIBIT 33

## Filed Under Seal

# EXHIBIT 34

## Filed Under Seal

# EXHIBIT 35





June 20, 2012

**Certification**

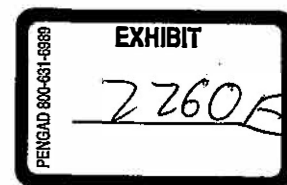
**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00029110E - CHU00029115E.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is written over a horizontal line.

Abraham I. Holczer

Project Manager



[TRANSLATION]

Visitation Report

Date: 2000/06/23(Fri.) 6-9pm Company: Philips Mr. Jim Smith, Mr. Leo Mink (via phone)

Date: 2000/06/25(Sun.) 6-9pm Company: IRICO Sales President SaTao

Contact: Wen-Chun (Tony) Cheng

Topic: TV Tube Market

I. PH TV Tube:

1. Regarding the issue which PH blamed CPT for not cooperating to raise the European 14" price to \$39, an appointment was made with Mr. Smith to exchange views and Jim carried out the review with Leo over the phone.
2. Leo stated that on 4/19 the price was proposed to be \$38 for the 2<sup>nd</sup> half of the year but around 5/25 everyone proposed to have the market price raised to \$39. CPT was only selling at \$37~37.5 for some customers right now so the price difference would be too big. He doubted if CPT could raise the price. CPT explained that Mr. Smith in the last Asian meeting also expressed that the appropriate price should be \$38 according to current European and Asian environment and 14/20" interactive environment. After contacting David Ross after the meeting, David said although Leo said to raise price to \$39 on 5/25 David already expressed that it was not easy to attain that because of the huge rise and the small price differential with 20/21" [Underlined by hand].
3. I doubted that Leo had achieved any agreement with customers and in the past he always lowered the target price with customers. Accordingly, I tried to confirm the accuracy of \$39 but Leo expressed he was still trying and hoped to gain support from CPT [Underlined by hand]. I stated that CPT always acted as a pioneer, not a trouble maker, and previous contact matched the current achievement CPT made, so it was not proper to inform the customers at the last minute to raise the price again by \$1. Besides, before current confusion regarding 20/21" is clearly improved, it is better to wait. In the meantime, CPT will also talk about the possibility of raising the price to \$38.5 [Underlined by hand] with customers. (PH indicated that the customers and targeted market of 14" and 20/21" are different so it won't have any transfer problem even if the price differential is \$5/10, respectively. I stated that current customers said 14" is sold for service only so they would abandon the production of 14" once their loss is too big after the price is raised to \$39 by \$3.)

English words found in the original text are italicized.  
Translator's remarks are indicated in brackets [ ].

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CHU00029110.01E  
Translation

4. *PH* questioned CPT again why its *PH TV* raised to \$36.8 by \$1.3 only in the internal transaction, which would cause bigger price differential with the market price. I countered by questioning why *PH CRT* didn't work together with *PH TV* to undergo price increase negotiations but waited for CPT to negotiate with *PH TV* first and didn't have to make any efforts but just used \$36.75 to undercut CPT [Underlined by hand]. Then *PH* started to explain it was beyond their control because this was related to another department. Accordingly, I asked *PH* to hint at the price adjustment first if *PH CRT* hopes to raise the price in Q4 and CPT will definitely cooperate.
5. Regarding the *Vestel* price from IRICO, it was not raised but still remained at FOB \$29.3, (\$35.5 after reaching the factories) [Underlined by hand] *PH* hopes CPT can negotiate again with IRICO to maintain a moderate price differential. I stated that further contact will be made but IRICO already felt unhappy about *PH*'s constant request which hopes the price differential between IRICO and *PH* can be curbed to \$0.5. (I stated that CPT sells 15" *cdt* at \$66 but IRICO still cannot sell any at \$58.) *Jim* encouraged me to ask IRICO to maintain the price differential around \$1 and I expressed that I would try my best to negotiate with IRICO.
6. CPT stated that it was very ridiculous that the current set price for 14" was \$38~39 but 20/21" in Europe was still DM 97~100/107~110, only US\$45/50, which was even lower than the price in China. Under such a condition, it's not healthy to ask CPT and IRICO, which only have one product, 14", to take the risk of irritating customers. *Jim* agreed that with full utilization rate the price should not be so weak. *Leo* stated that currently the negotiations with other European picture tube companies, (such as SEC and *Thomson*), didn't go smoothly. *Jim* said *Leo* should notify him earlier but he would ask SEC to pay attention.

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00029110.02E  
Translation

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Translator's remarks are indicated in brackets [ ].

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CHU00029111E  
Translation

According to *Leo*, for the short time it will be very difficult to have a reasonable price for 20/21" in the European market and the price can only be raised by \$0.5 at most each time. So there will still be a huge difference of \$13 from the reasonable price differential of \$18~20.

7. After the meeting, *Jim* talked to me alone and expressed that the expectation for next year's market is not as good as for this year but the CPT production, on the contrary, will increase from 3M this year to 4 M, which will cause big impact on the market. Accordingly, he hoped CPT could have a second thought. I said that CPT didn't intend to disturb the market and it is a sincere gesture to limit itself from taking orders from customers which have conflicting interests or to inform *PH* first before taking orders. Besides, the growth in quantity this year is mostly from CPT's original own customers and CPT didn't fight for orders viciously against *PH*. Next year, CPT will introduce 15" flat tube but the impact should not be too big. *Jim* still hopes CPT can control the production quantity.

## II. IRICO picture tube:

1. President Sa is responsible for all external purchase and external sales. Regarding sales, he assigned 14" mainly to *Vestel* and *Thomson* [Underlined by hand] and would start to promote 21" and 15" 0.28.
2. IRICO's business plan:

product	lines	production capacity	'99 sales	'00 target	
14"	2	3.6M	2.9	3.2	
21"	2	3.6	3.1	2.7	
25"	1	1.15	1.1	1.15	
15"0.28	1	1.5	1.1	1.25	
total	6	9.85	8.2	8.3	

- a. 14" sold to *Vestel* 1.5M, *Thomson* 0.2M (initial quoted price, \$29.5 *fob*, will be changed to \$31 *fob* = \$32 *cif*) [Underlined by hand] internal sales 0.9M, Hong Kong 0.6M
- b. Current inventory for 21", 100k, is normal. This year, the production line is changed to 25/29" so production is less than last year. China's market is integrating but there are still many difficulties [Underlined by hand].

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00029112.01E  
Translation

3. Regarding *Vestel's* sales, President Sa admitted that they are still selling at \$29.3, the increased price since April. (\$35.5 factory price) After meeting with *PH* and CPT in Xian, he had already tried to ask *Vestel* to raise the price again to \$31(factory price \$37.5) but immediately was accused by *PH* of anti-dumping tax. *Vestel* understands *PH* is also accusing *Vestel* of dumping. Currently, the price is raised by \$3 with the European customers, who account for 80% of all customers, but things are still in negotiation. In order to avoid too much fluctuation in price, it is hoped that IRICO and *Vestel* will share the rising cost after the case of dumping is established. June and July are the traditional low season for colored TV in China Mainland so IRICO made an agreement with *Vestel* to keep the current price unchanged until the end of July [Underlined by hand].
4. I reported how the prices increased in Asia and Europe and hoped IRICO could also respond but President Sa expressed that its trading volume with *Vestel* is already lowered to 1.5 M from the targeted 2.0M at the beginning of this year and the delivery quantity in June dropped to 60k from the regular 120k/m (but it already rose to 80k again). [Underlined by hand] Since the supply quantity cannot be raised and the service to *Vestel* is poor, the higher the price, the better it is. But it is hoped to maintain at least the price differential of \$1.5 otherwise IRICO will suffer bigger impact when the market becomes better. IRICO hoped to have one more month to observe. When the market becomes better in August, it can carry out a review again regarding the opportunity to raise prices [Underlined by hand].
5. As for 21", recent market is really not good. The agreed price among makers is *rmb* 1050, but actually is only *rmb* 750. The price of Panda brand is the lowest and current market inventory should still be 2.0 M. Although makers intended to integrate and decrease production to 3.0M the biggest maker, Changhong, didn't want to cooperate and even increased its production to 3.0M [Underlined by hand]. In the integrating meeting held the other day, all of the picture tube makers were called to the meeting and asked to cut the price to *rmb* 430 or they would lose the orders but picture tube makers were united, intending to cut production but not the price [Underlined by hand].

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00029112.02E  
Translation

[Page Intentionally Omitted]

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00029113E  
Translation



6. Currently, IRICO's internal sale price for 21" picture tube is rmb 530 [Underlined by hand] and there are no direct customers for external sales. Customers are all domestic customers who want to save tax and sell at \$48-48.5 (*etc*). President Sa stated that that price is higher than those of Hitachi and Shanghai Novel CPT Co., etc. [Underlined by hand] The price which Asia understands is too much higher than the actual prices. Companies in Turkey, such as *Vestel*, *Beko* and *Profilo*, have Hitachi as their core products and Novel CPT as supplementary core products. IRICO still doesn't have a chance. He also agreed to cooperate with Asian makers who hope to have a reasonable price at \$54.5(*etc*). But he also expressed that IRICO was not the key and IRICO could take the lead to raise the price when the market is still asking for reduction of production and promotion of sales.
7. 800k of 15" 0.28mm tube will be produced in the first half of the year [Underlined by hand]. Because of the melting problem of *DY*'s varnish hot there were many returned goods. Although the problem was resolved, sales didn't improve. Inventory has reached 600k. There was much pressure to sell and they hoped CPT can give them some advice. Samples had already been sent to *AOC*, *EMC* and *Vestel*, but there was no progress. CaiHuang used *PH*'s falling price to make IRICO decrease the price again from \$60 to \$58 [Underlined by hand]. Impression of Huangqi was not good, either. I also stated that *PH* didn't do business with Huangqi but raised price by \$2 to \$66-67 level. As for the trouble situation of IRICO, CPT hopes IRICO can contact CPT first after samples are approved and before negotiating price and quantity so as to avoid confusion.
8. Toshiba became share holder by investing equipment. Retired technical personnel from Toshiba were hired to as instructors. However, it was felt that Toshiba was not too enthusiastic in transferring technology. If there is any opportunity IRICO hopes to cooperate with CPT. I will send out invitation letters to invite them to visit CPT in November and December [Underlined by hand]. (The procedure will take about half a year.)

-End of report- Respectfully submitted for approval

Sales Wen-Chun (Tony) Cheng

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00029114E  
Translation



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Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00029115E  
Translation

### 接洽報告

日期: 89年6月23日(五) 6~9pm 廠商 Philips Mr. Jim Smith, Mr. Leo Mink(電話)

日期: 89年6月25日(日) 6~9pm 廠商 彩虹 業務 沙濤總經理

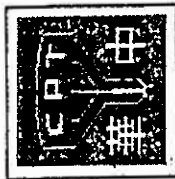
接洽: 鄭文俊

主旨: TV管市場

#### 一. PH TV管部份:

1. 針對PH指責華映在歐洲14"售價未配合調漲至\$39一事, 與Mr. Smith約見溝通, Jim遂與Leo接通進行檢討。
2. Leo說明雖在4/19所提議為下半年以\$38進行, 但在5/25前後均提議將市場價格調升至\$39, 質疑現華映在某些客戶處僅銷售\$37~37.5, 致差價過大, 無法推展。華映說明在前次亞洲大會中, Mr. Smith亦表示以現有歐亞及14/20"間互動環境, 認為較適合之價位應在\$38。會後與David Ross連繫, David稱5/25時, Leo雖說要調升至\$39, 但David已表示可能在漲幅過大且與20/21"差距過小, 並不易達成。
3. 職質疑Leo迄今並未與客戶達成任何協議且以往其與客戶總是再由目標價退縮, 希確認其所謂\$39之真確性, Leo表示現仍在撐, 希望華映能支持。職表示華映以往一直在做先鋒, 不是搗蛋的公司, 之前的連繫與現華映之達成結果符合, 現臨時再通知客戶即改再調高\$1並不適當, 且在現有20/21"亂象未有較明確的改善之前, 最好能再觀察一下。華映也會在此同時, 與客戶洽議將售價調高至\$38.5。(PH表示14"與20/21"客戶及市場對象不同, 即使差價僅各\$5/10, 也不會有移轉的問題, 職表示現有客戶表示14"純屬服務機種, 售價一次漲\$3, 至\$39, 虧損過大的情況下, 將放棄14"之生產。)
4. PH再質疑華映為何在其PH TV部門之內部交易僅漲\$1.3為\$36.8, 如此與市場之價差將更大。職反質疑這段時間何以PH CRT全不與PH TV進行調漲協商, 待華映與PH TV一番談判後, 不費吹灰之力, 遂以\$36.75來undercut華映。PH才解釋此為另一跨部門機能, 不是他們所能控制的。職遂要求若PH CRT希在Q4調漲的話, 請PH先去提示價位, 華映絕對可以配合。
5. 對於大陸彩虹在Vestel的售價仍維持在FOB \$29.3 (等於到廠\$35.5)未調漲, PH希華映可再與彩虹協調不要將價差拉得太大。職表示將再與彩虹連繫, 但PH一再希望彩虹與PH售價差\$0.5以內, 造成彩虹之不諒解(職表示15"cdt華映賣\$66, 彩虹賣\$58都還賣不出去)。Jim表示應可請彩虹試著將價格維持約\$1的差距, 職表示將努力協商看看。
6. 華映說明現14"以\$38~39定價, 20/21"在歐洲卻仍在DM 97~100/107~110, 僅及US\$ 45/50, 比中國大陸還低, 實在是滑天下之大稽。如此結構硬要僅有14"單項產品的華映及彩虹去犯惱怒客戶之險, 並不是很健康的作法。Jim亦認為現以全滿稼動, 售價不應如此軟弱。Leo表示與現有歐洲其他映管(如三星與Thomson)之協商並不順利, Jim表示Leo應及早讓他知道, 他會請三星注

# 第四章 各工程規劃進度



工程名稱	規劃負責人	設計單位	發包資料 預計/實際	發包完成 預計/實際	承包商	預計入廠 施工時間	目前進度	備註
1 廠房建築工程	洪榮良	鴻昇	6/5	6/5	宏綱	4月24日	發包資料開單中	
2 廠房主水工程	郭司輝	鴻昇	6/5	6/5	中乙科	1月18日	如鋼骨工程進度	
3 廠房外牆工程	楊金印	鴻昇	6/20	6/31	榮安好	7月1日	地下工程施中	
4 Coating/外牆工程	郭司輝	CPTI/鴻昇	6/20	6/31	榮安好	7月1日	備料中	
5 消防/給水系統 空調/給水系統 內家(含PA系統) HVAC電扇 無塵電線	郭司輝 郭司輝 劉成方 王冠玲 吳保中 蔡國輝	動致 動致 動致 動致 動致 動致	5/12 5/12 5/12 5/12 5/12 5/12	5/31 5/31 5/31 5/31 5/31 5/31	台灣三友 -- -- -- -- -- --	7月30日 7月30日 7月30日 7月30日 7月30日 7月30日	提列設計中 發包完成 5/2圖面到採購 5/17補充資料二及 標單到採購 補充資料三5/18到採購 5/24發包中	
6 製程給水/廢水排流	劉成方	動致	5/15	5/15	--	8月15日	5/24發包中	
7 超純水設備	林瑞均	廣新	3/31	3/31	日華	8月15日	6/8 bid off	
8 特殊氣體/Bulk gas	謝宇傑	動致	5/15	5/24	--	7月30日	5/24發包中	
9 PCF	劉高幸	動致	5/15	5/24	--	8月15日	5/24發包中	
10 空氣系統	張益川/ 王昭雄	動致	3/20	5/24	--	8月15日	5/24發包中	
11 消毒設備	謝宇傑	廣新	6/15	7/15	--	12月31日	發包資料採購中	
12 中央氣壓系統	陳瑞成	動致	5/15	5/24	--	9月15日	5/24發包中	
13 廢水系統	林健晉	動致	5/15	5/24	--	8月31日	5/24發包中	
14 總管/排地	王昭雄	動致	2/15	2/15	瑞明	2月29日	排地已完減85%	
15 室溫測試	郭政裕	--	7/31	7/15	佳友	2月29日	已完減一次測試	
16 大氣測試	郭政裕	--	7/31	7/15	--	--	預計到進行	
17 全廠潔淨	吳建德	TFT動力	5/15	6/15	--	9月15日	發包資料採購中	
18 廠務設施監控(含限制/停風) ITV	吳建德	TFT動力	5/15	6/15	--	9月15日	發包資料採購中	
19 一般管線	蔡國輝	總管處	5/15	6/8	--	3月1日	6/8發包中	
20 二號大系統	沈逸清	總管處	3/11	12/1	--	12月31日	預計到進行	

2000/6/13

TFT-II SIP工地事務所製作



意。但依Leo之說法，短期內歐市之20/21"價位要合理化將極困難，頂多每次只能調漲\$0.5，與應有之價差\$18~20，仍有\$13之大差距。

7. Jim在會後單獨向職表達明年之市場預期不如今年，但華映產出反而再從今年的3M提升至4M，對市場的影響會很大，請華映考慮。職說明並無意擾亂市場，在某些有衝突之客戶處的接單給予限制或先與PH照會都是誠意的表現，今年數量的成長大部份都是由華映原有的專屬客戶來的，未惡性與PH搶單，明年還會導入15"全平管，影響應不致過大，Jim還是希望華映能控制產量。

## 二. 彩虹映管部份：

1. 沙總負責所有外購外銷工作，銷售部份以14"給Vestel Thomson為主，近期將開始推展21"及15" 0.28。

### 2. 彩虹之事業計劃：

生產	線	產能	'99銷	'00目標
14"	2	3.6M	2.9	3.2
21"	2	3.6	3.1	2.7
25"	1	1.15	1.1	1.15
15"0.28	1	1.5	1.1	1.25
total	6	9.85	8.2	8.3

- a. 14"售Vestel 1.5M, Thomson 0.2M (初報價\$29.5fob, 將改報\$31fob=\$32cif), 內銷0.9M, 香港0.6M。
- b. 21"理庫存100k異常，今年因改線為25/29"故產出較去年少，大陸市場正整合中，但仍有不少困難。
3. 就Vestel之銷售部份，沙總承認現仍以四月調漲的\$29.3 (到廠\$35.5)銷售，前次在西安與PH及華映開會後，即曾試圖向Vestel要求再調漲至\$31 (到廠\$37.5)，但隨即遭PH控訴的反傾銷稅，Vestel瞭解PH現亦向Vestel控告整機傾銷，現雖亦向銷售比例達80%的歐洲客戶調漲\$3，但也還在洽議中，為避免售價過度波動，希彩虹與Vestel共同分攤傾銷成立後之成本上漲，由於六、七月為大陸地區彩色電視之傳統淡季，彩虹遂與Vestel協議現價暫時不動至七月底。
4. 職表達在亞洲與歐洲價位上漲之進度，並希彩虹能共襄盛舉，沙總表示與Vestel之交易量從年初預定的2.0M調降至今1.5M，六月交貨量從以往120k/m大幅降低至60k (現再提升至80k)，下半年的供貨量無法上升，對Vestel的服務很差，售價當然愈高愈好，但希望能至少保持\$1.5的價差，否則日後市場反轉，在有傾銷懲處下，其他地區的客戶未及開拓，彩虹會受到較大之傷害，彩虹希望能再觀察一個月，八月市場較佳時期再檢討掌握時機調漲。
5. 21"近期之市場的確不佳，整機廠的協議售價在rmb 1050，但實際只有rmb 750，以熊貓牌最低，現市場庫存應仍有2.0M，整機廠雖意欲整合減產3.0M，但最大的長虹卻不參加還增產3.0M，日前整合會議中同時把映管廠叫到一起要求誰不降價至rmb 430就不給單，映管廠倒是很團結的打算減產不降價。

## Unit - p. 10

Unit - Pro

國巨膠片 5 月份設備維護中 1,398.987 pcs 達成率 100.0 %

与顺利超目標量成多!預5月份整體銷售1399,237 pcs 達成率107.3 %。(如合銷退7,086 pcs, 實收1400K!)

有力所致, 預 S/F 成品庫存較前上升 29,919 pcs 至 421,931 pcs = CTV 236,768 pcs + CDT 185,163 pcs.

截止6月，因禁烟造成客户流失估计达16万。据调查，禁烟后，许多客户因不适应无烟环境而选择离开。此外，一些小型商户也因无法承担高昂的禁烟成本而被迫关闭。

0006157 示移諸共生

000050/90 日 1985年 10月



6. 目前彩虹21"映管內銷價rmb 530，外銷沒有什麼直接客戶，都是一些內地客戶以保稅方式賣\$48-48.5(itc)，沙總表示此價格較日立及永新等公司都還高，亞洲所瞭解的價位比實際情況高太多，目前土耳其的Vestel, Beko, Profilo等就是以日立為主，永新為輔，彩虹還沒機會。對於亞洲地區廠商希望價格能夠合理化至\$54.5(itc)亦表贊同配合，但表示彩虹不是關鍵，在市場還面臨減產或促銷的情況下，彩虹無法先行去漲。
7. 15" 0.28mm管在上半年將生產800k，因DY之凡立膠熱熔化問題遭逢大量退貨，現雖解決，銷售仍然不行，庫存達600k。最近有很大的銷售壓力，請華映指點迷津，現已送樣給AOC, EMC, Vestel, 但都沒什麼進展。彩皇以PH跌價來要脅，故不得不再從\$60降為\$58，對皇旗整體觀感也不是很好。職同時說明PH不但未與皇旗交易，近期還在市場上調漲\$2，到\$66-67的水準，對於彩虹的困境，希望在其樣品通過要洽談價位數量前，能跟華映連繫一下，免得造成混亂。
8. 現以設備投資的方式讓東芝入股，同時聘請東芝技術的退休人員指導，感覺東芝在移轉技術上沒有很積極，若有機會希望能和華映合作。職將發邀請函請其於11/12月來訪。(手續需時約半年)

以上報告 恭呈核示

業務 鄭文俊

Revised : 05-E0

Unit : PC

## CPTM PRODUCTION-SALES-STOCK FORECAST ANALYSIS

(FOR MONTH OF MAY 2000)

Date : 26-May

2/10

PRODUCTION										SALES										STOCK										
		Last Month	This Month	Diff (+/-)	%Age Changed	Last Month	This Month	Diff (+/-)	%Age Changed			May'99	Diff (+/-)	%Age Changed	Last Month	This Month	Diff	%Age Changed			Month	This Month	Diff	%Age Changed			Month	This Month	Diff	%Age Changed
13V MDN		407694	637487	229793	56.4%	510324	512580	2256	0.4%			227026	285554	125.8%	73272	198441	125169	170.8%			198441	125169	170.8%					125169	170.8%	
19V		146732	174905	28173	19.2%	157857	164536	6679	4.2%			105504	59032	56.0%	23110	34120	11010	47.6%			34120	11010	47.6%					11010	47.6%	
				-609	-7.1%	8282	9315	1033	12.5%			6392	2923	45.7%	5464	4207	-1257	-23.0%			4207	-1257	-23.0%					-1257	-23.0%	

# EXHIBIT 36

## Filed Under Seal



# EXHIBIT 37

## Filed Under Seal

# EXHIBIT 38

[TRANSLATION]

[Handwritten:] ~~Chung~~ [Crossed out by hand]/ Yu

CPTF Sales Department Visitation Report

Meeting Topic: Mainland China CDT Market Exchange

Time: '00/09/14 Location: Changsha

Meeting Attendees: CPTF: Director Jing-Song (Jason) Lu, Wei-Lie Yu  
IRICO: Vice Department Manager Shao-Jie Wang  
SDD: Section Chief Zhen Yang, Section Chief Jun Cui/TSDI,  
BMCC: Manager Xin-Wen Huang  
LG: Department Manager Ya-Ping Yang/LG Changsha, Section Chief Yi-Xiang Fang; Vice President Sung Yuol Shin/Shenzhen Office  
ORION: Myong Doel Park/korea, Representative Jae Guil Kim /Shanghai office  
PHS: Director Dong Liu

Content:

- I. 00. OCT - NOV exchange on production, sales and inventory figures of Mainland China CDT (see attachment 1).
- II. Explanation:
  1. SDI:
    - Affected by the decrease of 17" CDT orders from its major customers ACER/DELTA/TSEC/EMC, there is still a small amount of inventory in this month. In accordance with the agreement, 15" will still stop production for a week. But indicated that since its 15"CDTx1L had converted to 17"CDT in Korea, it needed to communicate with the headquarters as to whether the production reduction should still be arranged at its plant in Mainland China. The market for domestic sales is booming.
    - Indicated that the Shenzhen plant will utilize 17"RF/17"Normal/19"CDTx1L starting '01.2, among which mass production will be arranged for 17"RF with 1/2L production capacities.
    - SDI is expected to utilize 17"RFx8Lines [Underlined by hand] starting next year. 15"CDTx3Lines will be utilized each in Malaysia/Korea/CHN respectively. Will stop production of Mini tubes in '00.9. Whether or not to use new types of tubes for delivery is not confirmed.  
[Handwritten above underlined text:] Should be the total of 17"/19"RF tube production lines

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

- Indicated that the domestic sales ratio of Shenzhen plant and Tianjin plant is 40% and 30% respectively (calculated with the total volume of *CDT* + *CPT*).

2. *PHS*:

- The *CDT*x3*L* (14"x1*L*, 15x2*L*) shifted from Taiwan are currently in the process of utilizing mass production in succession (9/*E*, 10/*M*, 10/*E*). Among these, 14"x1*L* will be converted to 17"*CDT*x1*L* in October (to achieve the target for domestic sale demand), namely starting from '00.10, 14"*CDT*x1*L*; 15"*CDT*x3*L*; 17"*CDT*x1*L* will be utilized for production. [Handwritten above text:] The production lines that shifted from Chubei must be 100% for export sales.
  - Additionally, the two lines currently in Taiwan will also be shifted to Mainland China starting October of this year. It is estimated that the mass production of (15"/17"*CDT*, each 1*L*) can be utilized starting '01.3 - 4.
  - According to the investment application for this line-shifting project by Huafei, the products are required to be 100% for export sales. So starting October, the 14"*CDT* (converted from the 1*L* shifting line) will temporarily not be available for domestic sale (under the current environment of the campaign against smuggling, it is planned to temporarily sell the products of this shifting line x3*L* overseas). According to Director Liu, presently Huafei actually does not have the right to sell domestically (including the first stage of 2*L*). However, under the support of the local government and the customs, its domestic sales were achieved [Underlined by hand] (based on the market exchange information, currently the ratio of its domestic sale is over 70%).
3. *IRICO* (*IRICO*):
- With the domestic market demand getting vigorous and with its inducing orders by low prices, the Mainland customers of internal demand transactions have been expanded. The total inventory of 15"*CDT*

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Translator's remarks are indicated in brackets [ ].

has somewhat decreased. However, it declined to comment when questioned by Samsung that its actual inventory number should be much higher than the current informed number. At present, it still sticks to its old way of doing things as far as the market price is concerned, and has not adjusted its price according to the common understanding of the market. [Handwritten above text:] According to *SDI*, *IRICO*'s inventory still reaches 300K.

- The 17" *CDT* x 1L jointly invested with *TSB* is expected to utilize in '01 Q3 - Q4. The *CDT* joint venture project is estimated to have total of 3 - 4L production lines; all will be utilized by shifting the old lines from Japan.

4. *ORION*:

- With the weakening of the 14" *CM* market (*AOC*), indicated that will only deliver 25k/m to *AOC* in the future. 14" *bulb* from Mainland Anyang was not led in smoothly due to its overall quality issues and delivery time.
- Affected by the order increases of Mainland China Weihai and Daewoo, the follow up deliveries of 15"/17" *CDT* have gradually increased (15": 10-20k/m; 17": 5-8k/m). At present, Mainland China still considers *AOC* as its main delivery subject.
- The *B* tubes were sold through a Korean *agent* before. The situation got out of control and the *B* tubes flowed to Mainland China. Has stopped this kind of transactions since Q2. Quite sure that there is no Daewoo *B* tube at the current market.
- Also indicated that the trading price with *AOC/EMC* 17" (*tco*) is @usd84. Its price gap of *tco/mpr2* is usd2/pc.
- The joint venture project with Mainland China has not been proceeding well due to the financial issues of the Chinese party. Presently is trying to look for new partners.

5. *LG*:

- The *LG* Changsha (*LGESG*) was established in '94.8 with *LG* and the domestic capital *share* 55% and 45% respectively. At present, the first phase (21" *CPT* x 1L; 21"/25" *CPT* x 1L; 25" *CPT* x 1L) and the second phase (29"/33" *CPT*, Mass production in '00.7) of the project have been completed and production has been started. The designed production capacities are 3500k/Y & 1000k/Y respectively.
- For the third phase 15"/17" *CDT* x 1L (*C'TY*: 2000k/Y), it is expected to have mass production in Q2-Q3 of next year. The mass production target is 300k/'01. In addition, also planned to set up lines of mass production for 15"/17" *RF* (*C'TY*: 2000k/Y x 1L and 29" *LFT* (*C'TY*: 1700k/Y) x 1L).

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- Because of quality issues, hasn't had transaction with *ADI* since Q2 of the first half of this year. Delivered 1*m* [Handwritten: "Delivery to *CTX*"] in 1999. Up to now, only 180*K* in '00. Whether the future orders can be realized or increased depends on the order situation from *Kfc*.

[Handwritten:] Yu claimed that with regard to Taiwan makers, it is retreating in defeat again and again, except *AOC*.

6. *BMCC*: Already confirmed that the 15"/17" *CDT* x1*L* equipment will be installed in '01/*E*. Formal mass production (*C'TY*: 2000*K/Y*) will be in '02/*M*. Also, its top management has intended to again set up and utilize 17" *CDT* (*RF*) x1*L* in '02/*E* (converted from 21" *CPT* production line).

III. The next *CDT* meeting is scheduled to be hosted by *CPTF* in Fuzhou on 10/12 *PM* 3:00.

- End of report -

[Handwritten: "Respectfully"] Submitted to:  
Senior Manager  
Director  
President

[Handwritten:]  
Sales Department Director Cheng  
Vice president

[Initialed:] Peng *SEP* 20/2*K*

[Initialed:] Jing-Song (Jason) Lu 9/18'00

[Signed:] Wei-Lie Yu 9/18'00

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Translator's remarks are indicated in brackets [ ].

	Type	Prod	‘00.08.Sale			E/s	Prod	‘00.09.Sale			E/s	Prod	‘00.10.Sale			E/s	Prod	‘00.11.Sale			E/s
			Ttl	Local	Export			Ttl	Local	Export			Ttl	Local	Export			Ttl	Local	Export	
Philips	14”(Local)	79	79	49	30	0	100	100	60	40	0	0	60	0	0	0	0	60	0	0	0
	15”(Local)	81	81	81	0	0	100	100	100	0	0	0	100	63	37	0	0	120	63	57	0
	15”(Import)		86		86			90		90			50		50			50		0	
	17”(Import)		103	0	103			100		100			80	20	60			80		0	
SDI	14”(Local)	86	86	41	45	0	80	80	40	40	0	80	80	40	40	0	75	75	35	40	0
	14”(Import)				0					0					0					0	
	15”(Local)	165	165	75	90	0	165	165	70	95	0	200	200	80	120	0	210	210	70	40	0
	15”(Import)		215		215			230		230			230		230			230		230	
	17”(Local)	122	110	46	64	12	120	130	60	70	2	110	110	40	70	0	130	130	50	80	0
	17”(Import)		247		0			0		0			0		0			0	0	0	
CPT	14”(Local)	144	141	0	141	12	100	100		100	12	0	130		130	0	0	130		130	0
	14”(Import)		160		160			140		140			120		120			100		100	
	15”(Local)	208	207	140	67	16	234	234	130	104	16	0	280		280	0	0	300		300	0
	15”(Import)		300		300			330		330			350		350			350		350	
	17”(Import)		350		350			350		350			320		320			320		320	
Orion	14”(Import)		23		23			26		26			25		25			25		25	
	15”(Import)		86		86	0		111		111	0		116		116	0		133		133	0
	17”(Import)		55		55	0		66		66	0		60		60	0		67		67	0
BMCC	14”(Local)																				
IRICO	15”(Local)	78	118	118	0	59	80	120	120	0	19	80	99	99	0	0	80	80	80	0	0
LG	14”(Import)		0		0			0		0			0		0			0		0	
	15”(Import)	0	130		130			150		150			150		150			135		135	
	17”(Import)	0	225		225			205		205			220		220			220		220	
Total	14”(Local)	309	306	90	216	12	280	280	100	180	12	80	270	40	170	0	75	265	35	170	0
	14”(Import)		183	0	183			166	0	166	0	0	145	0	145	0	0	125	0	125	0
	15”(Local)	532	571	414	157	75	579	619	420	199	35	280	679	242	437	0	290	710	213	397	0
	15”(Import)		817	0	817			911	0	911	0	0	896	0	896	0	0	898	0	848	0
	17”(Local)	122	110	46	64	12	120	130	60	70	2	110	110	40	70	0	130	130	50	80	0
	17”(Import)		980	0	733			721	0	721	0	0	680	20	660	0	0	687	0	607	0
	Total	963	2967	550	2170	99	<sup>[Illegible]</sup> 79	2827	580	2247	49	470	2780	342	2378	0	495	2815	298	2227	0

English words found in the original text are *italicized*.

Translator’s remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00031046E

## CPTF 业务部

洽

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报

告

会议主题: 大陆 CDT 市场交流

时间: '00/09/14

地点: 长沙

与会人员:

CPTF: 吕处长 镜松, 余伟列

IRICO: 王昭杰副部长

SDD: 杨真课长, 崔军课长/TSDI,

BMCC: 黄新闻经理

LG: 杨亚平部长/LG 长沙, 方一相课长; 辛升烈副总经理/ 深圳办事处

ORION: 朴明德/korea, 金载喆 代表/上海办事处 PHS: 刘东处长

内容:

一、00. OCT-NOV 大陆 CDT 产销存数据交换(如附件一)

二、说明:

## 1. SDI:

- 受其主要客户 ACER/DELTA/TSEC/EMC 17"CDT 订单减少影响, 致本月仍有小量库存; 15"依约仍停产一周, 惟表示在其韩国由 15"CDTx1L 转为 17"CDT 下, 仍安排大陆工厂减产一事再与总部沟通; 内销市场呈现旺销态势。
- 表示深圳工厂将从'01.2 月稼动 17"RF/17"Normal/19"CDTx1L, 其中 17"RF 将以 1/2L 产能安排量产。
- 预计明年起 SDI 将有 17"RFx8Lines 稼动, 而 15"CDTx3Lines 分别于 Malaysia/Korea/CHN 各 1 线稼动; '00.9 月将停止 Mini 管生产, 是否改以新管型替代交货未予确认。
- 表示深圳厂、天津厂目前内销比例各约为 40%、30% (系以 CDT+CPT 总量核计)。

## 2. PHS:

- 台湾 CDTx3L (14"x1L, 15x2L) 迁移线目前陆续在稼动量产中 (9/E、10/M、10/E) 而现其中 14"x1L 将于 10 月改制为 17"CDTx1L (以达成内销需求目标); 即从'00.10 起 14"CDTx1L; 15"CDTx3L; 17"CDTx1L 稼动投产。
- 另台湾现 2 线亦将从今年 10 月开始迁线到大陆, 预计从'01.3-4 月起可稼动量产 (15"/17"CDT 各 1L)。
- 依华飞该迁移线投资案申请, 产品系要求 100%外销, 故将从 10 月起 14"CDT (由其中 1L 迁移线改制) 暂无法内销 (在目前打私环境下, 暂规划该迁移线 x3L 产品以外销方式进行)。依刘东处长表示, 现华飞 CDT 实质无内销权 (含前期 2L), 而在当地海关及政府支持下达成内销 (依交换市场信息计, 目前其内销比例达 70% 以上)。

## 3. IRICO(彩虹电子):

- 在内销市场需求趋旺及其低价诱单下, 大陆内需交易客户数有所拓展, 15"CDT 整



体库存状况有所降低；惟三星仍质疑其实际库存量应远高于现交流数字，其不置可否。目前其在市场价格方面仍我行我素，未依市场共识调整价格。

- 与 TSB 合资 17"CDTx1L 预计于'01.Q3-Q4 稼动，CDT 合资案预计共 3-4L 生产线，均将从日本迁移旧线方式进行稼动。

#### 4. ORION:

- 在 14"CM 市场 (AOC) 减弱下，表示后续仅预计 25k/m 予 AOC；大陆安阳 14"bulb 由于整体品质状况及交期缘故未能顺利导入。
- 受大陆威海大字订单增加影响，后续 15"/17"CDT 交货渐有成长 (15":10-20k/m; 17":5-8k/m)；目前大陆仍以 AOC 为其主要交货对象。
- 前 B 管曾由韩国 agent 代理销售，致失控外流到大陆，从 Q2 已开始停止此类交易，确定现市场上应无大字 B 管。
- 另表示目前与 AOC/EMC17"(tco) 交易价格均为 @usd84，其 tco/mpr2 价差为 usd2/pc。
- 与大陆合资案仍受中方财务问题未能顺利进行，目前试图另寻新的合作伙伴。。

#### 5. LG:

- 长沙 LG (LGESG) 由 LG 及内资分别 share55%及 45%于'94.8 成立，目前已建成投产第一期 (21"CPTx1L; 21"/25"CPTx1L; 25"CPTx1L) 及第二期 (29"/33"CPT, '00.7 量产) 工程，设计产能分别为 3500k/Y & 1000k/Y。
- 第三期 15"/17"CDTx1L (C'TY:2000k/Y) 预计于明年第 2-3 季量产，量产目标为 300k/'01。另计划 '02 年再设线量产 15"/17"RF (C'TY:2000k/Y)x1L 及 29"LFT (C'TY:1700k/Y)x1L。
- 由于品质问题从上半年第二季起即无与 ADI 交易往来 (99 交货 1m; '00. 至今仅 180k)，后续订单能否达成及或增加将视 Kfc 下单状况。

- 6. BMCC: 已确定于 '01/E 开始 15"/17"CDTx1L 设备安装，'02/M 正式量产 (C'TY:2000K/Y)；另其高层亦已达成 '02/E 再设线稼动 17"CDT (RF)x1L 之意向 (从现 21"CPT 生产线改造)。

四、下次 CDT 会议预计于 10/12 PM3:00 由 CPTF 在福州主办。

-以上报告-

呈

经理

处长

总经理

杨文，郭文发 副总经理

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SEP/20/06

18.00 余伟明 9/20/06

CONFIDENTIAL - GRAND JURY MATERIAL

	Type	Prod	'00.08.Sale				E/s	Prod	'00.09.Sale				E/s	Prod	'00.10.Sale				E/s	Prod	'00.11.Sale				E/s
			Ttl	Local	Export				Ttl	Local	Export				Ttl	Local	Export				Ttl	Local	Export		
Philips	14"(Local)	79	79	49	30	0	100	100	60	40	0	0	60	0	0	0	0	60	0	0	0	0			
	15"(Local)	81	81	81	0	0	100	100	100	0	0	0	100	63	37	0	0	120	63	57	0	0			
	15"(Import)		86		86			90		90			50		50			50		0					
	17"(Import)		103	0	103			100		100			80	20	60			80		0					
SDI	14"(Local)	86	86	41	45	0	80	80	40	40	0	80	80	40	40	0	75	75	35	40	0	0			
	14"(Import)				0					0					0					0					
	15"(Local)	165	165	75	90	0	165	165	70	95	0	200	200	80	120	0	210	210	70	40	0	0			
	15"(Import)		215		215			230		230			230		230			230		230					
	17"(Local)	122	110	46	64	12	120	130	60	70	2	110	110	40	70	0	130	130	50	80	0	0			
	17"(Import)		247		0			0		0			0		0			0	0	0					
CPT	14"(Local)	144	141	0	141	12	100	100		100	12	0	130		130	0	0	130		130	0	0			
	14"(Import)		160		160			140		140			120		120			100		100					
	15"(Local)	208	207	140	67	16	234	234	130	104	16	0	280		280	0	0	300		300	0	0			
	15"(Import)		300		300			330		330			350		350			350		350					
	17"(Import)		350		350			350		350			320		320			320		320					
Orion	14"(Import)		23		23			26		26			25		25			25		25					
	15"(Import)		86		86	0		111		111	0		116		116	0		133		133	0	0			
	17"(Import)		55		55	0		66		66	0		60		60	0		67		67	0	0			
BMCC	14"(Local)																								
IRICO	15"(Local)	78	118	118	0	59	80	120	120	0	19	80	99	99	0	0	80	80	80	0	0	0			
LG	14"(Import)		0		0			0		0			0		0			0		0					
	15"(Import)	0	130		130			150		150			150		150			135		135					
	17"(Import)	0	225		225			205		205			220		220			220		220					
Total	14"(Local)	309	306	90	216	12	280	280	100	180	12	80	270	40	170	0	75	265	35	170	0	0			
	14"(Import)		183	0	183			166	0	166	0	0	145	0	145	0	0	125	0	125	0	0			
	15"(Local)	532	571	414	157	75	579	619	420	199	35	280	679	242	437	0	290	710	213	397	0	0			
	15"(Import)		817	0	817			911	0	911	0	0	896	0	896	0	0	898	0	848	0	0			
	17"(Local)	122	110	46	64	12	120	130	60	70	2	110	110	40	70	0	130	130	50	80	0	0			
	17"(Import)		980	0	733			721	0	721	0	0	680	20	660	0	0	687	0	607	0	0			
	Total	963	2967	550	2170	99	79	2827	580	2247	49	470	2790	342	2378	0	495	2815	298	2227	0	0			

CHU00031046

- 与 TSB 合资 17" CDTx1L 预计于 '01. Q3-Q4 稼动, CDT 合资案预计共 3-4L 生产线, 均将从日本迁移旧线方式进行稼动。

- 在 14"CM 市场 (AOC) 减弱下, 表示后续仅预计 25k/m 予 AOC; 大陆安阳 14"bulb 由于整体品质状况及交期缘故未能顺利导入。
- 受大陆威海大字订单增加影响, 后续 15"/17"CDT 交货渐有成长 (15":10-20k/m; 17":5-8k/m); 目前大陆仍以 AOC 为其主要交货对象。
- 前 B 管曾由韩国 agent 代理销售, 致失控外流到大陆, 从 Q2 已开始停止此类交易, 确定现市场上应无大字 B 管。
- 另表示目前与 AOC/EMC17"(tco) 交易价格均为 @usd84, 其 tco/mpr2 价差为 usd2/pc。
- 与大陆合资案仍受中方财务问题未能顺利进行, 目前试图另寻新的合作伙伴。。

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- 第三期 15"/17" CDTx1L (C'TY: 2000k/Y) 预计于明年第 2-3 季量产, 量产目标为 300k/'01。另计划 '02 年再设线量产 15"/17" RF (C'TY: 2000k/Y) x1L 及 29" LFT (C'TY: 1700k/Y) x1L。
- 由于品质问题从上半年第二季起即无与 ADI 交易往来 (99 交货 1m; '00. 至今仅 180k), 后续订单能否达成及或增加将视 Kfc 下单状况。

白粉皮、山刺藤、 $\text{AsC}$ 外，新叶部之交通。

-以上报告-


经理

处长

总经理

王毅、郭文友副总经理

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539 | 20 | 26


 余皓子 9/10/00

CONFIDENTIAL - GRAND JURY MATERIAL

	Type	Prod	'00.08.Sale				E/s	Prod	'00.09.Sale				E/s	Prod	'00.10.Sale				E/s	Prod	'00.11.Sale				E/s
			Ttl	Local	Export				Ttl	Local	Export				Ttl	Local	Export				Ttl	Local	Export		
Philips	14"(Local)	79	79	49	30	0		100	100	60	40	0		0	60	0	0	0		0	60	0	0	0	
	15"(Local)	81	81	81	0	0		100	100	100	0	0		0	100	63	37	0		0	120	63	57	0	
	15"(Import)		86		86				90		90				50		50				50		0		
	17"(Import)		103	0	103				100		100				80	20	60				80		0		
SDI	14"(Local)	86	86	41	45	0		80	80	40	40	0		80	80	40	40	0		75	75	35	40	0	
	14"(Import)				0						0						0						0		
	15"(Local)	165	165	75	90	0		165	165	70	95	0		200	200	80	120	0		210	210	70	40	0	
	15"(Import)		215		215				230		230				230		230				230		230		
	17"(Local)	122	110	46	64	12		120	130	60	70	2		110	110	40	70	0		130	130	50	80	0	
	17"(Import)		247		0				0		0				0		0				0	0	0		
CPT	14"(Local)	144	141	0	141	12		100	100		100	12		0	130		130	0		0	130		130	0	
	14"(Import)		160		160				140		140				120		120				100		100		
	15"(Local)	208	207	140	67	16		234	234	130	104	16		0	280		280	0		0	300		300	0	
	15"(Import)		300		300				330		330				350		350				350		350		
	17"(Import)		350		350				350		350				320		320				320		320		
Orion	14"(Import)		23		23				26		26				25		25				25		25		
	15"(Import)		86		86	0			111		111	0			116		116	0			133		133	0	
	17"(Import)		55		55	0			66		66	0			60		60	0			67		67	0	
BMCC	14"(Local)																								
IRICO	15"(Local)	78	118	118	0	59		80	120	120	0	19		80	99	99	0	0		80	80	80	0	0	
LG	14"(Import)		0		0				0		0				0		0				0		0		
	15"(Import)	0	130		130				150		150				150		150				135		135		
	17"(Import)	0	225		225				205		205				220		220				220		220		

Total	14"(Local)	309	306	90	216	12	280	280	100	180	12	80	270	40	170	0	75	265	35	170	0			
	14"(Import)		183	0	183			166	0	166	0	0	145	0	145	0	0	125	0	125	0			
	15"(Local)	532	571	414	157	75	579	619	420	199	35	280	679	242	437	0	290	710	213	397	0			
	15"(Import)		817	0	817			911	0	911	0	0	896	0	896	0	0	898	0	848	0			
	17"(Local)	122	110	46	64	12	120	130	60	70	2	110	110	40	70	0	130	130	50	80	0			
	17"(Import)		980	0	733			721	0	721	0	0	680	20	660	0	0	687	0	607	0			
→	Total	963	2967	550	2170	99	779	2827	580	2247	49	470	2790	342	2378	0	495	2815	298	2227	0			

CHU00031046

# EXHIBIT 39

## Filed Under Seal

# EXHIBIT 40

## Filed Under Seal

# EXHIBIT 41

## Filed Under Seal

# EXHIBIT 42

## Filed Under Seal



# EXHIBIT 43

## Filed Under Seal

# EXHIBIT 44

## Filed Under Seal

# EXHIBIT 45

STATE of NEW YORK     )  
                                      )  
COUNTY of NEW YORK    )

ss:

**CERTIFICATE OF ACCURACY**

This is to certify that the attached document, “SDCRT-0087694 – SDCRT-0087698”, originally written in *Korean* is, to the best of our knowledge and belief, a true, accurate, and complete translation into *English*.

Dated: January 9, 2013



Seth Wargo  
Consortra Translations

Sworn to and signed before ME this  
9<sup>th</sup> day of January,  
2013.



Notary Public

JAMES G MAMERA  
Notary Public, State of New York  
No. 01MA6157195  
Qualified in New York County  
Commission Expires Dec. 4, 2014

Color CRT Industry Meeting Results Report
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■ Time / Place: May 10~12, 2001/Shanghai Dingshanhu Taiyangdao Hotel meeting room

■ Attendees:

BMCC - Shin Chung Yang (Vice president), Moon Kang Bum (General Manager) & 2 others  
 SEG - Sung Jeon Sohn (President), Mr. Gook Gyoon Yang (General Manager) & others  
 LG Changsha - Ah Pyung Yang (General Manager)  
 Guangdong CPT - Choon Gyu Ha (Vice president), Wee Hun Oh (General Manager)  
 Irico - Secretary Gyu. Doh, General Manager Gun Sul Wee  
 Philips - Kang Kim (Consultant), Soo Hwa Lee (Sales Team Manager)  
 Shanghai Yongxin - Ga Chon. Ju (President), Mr. Jang (Vice President), Moon Eui Bun (Manager)  
 and 5 others (HOST)  
 SDI - Executive Director Gwan Tae Choi, Mr. Rim Bong Wang (Manager)

■ Main issues

A) CRT company inventories at the end of April

(Unit: 10K)

	BMCC	Philips	Irico	LG Changsha	Guangdong CPT	SEG	Shanghai Yongxin	SDI	Total
14"	22.7	-	37.3	-	-	-	-	-	60
21"	5.9	1.6	3.5	2.7	0	2.2	1.2	0.3	17.4
21"DF	0	-	-	-	-	-	-	0.1	0.1
25"	-	8.6	6.4	6	27.4	-	12.3	0.4	61.1
25"DF	-	-	3	-	-	-	-	0	3
29"HF	-	-	-	-	8.1	-	-	0.6	8.7
29"SP	11.7	21.2	-	2.9	15.4	-	37.9	0	89.1
29"DF	3.5	-	-	10.1	-	-	-	0.5	14.1
34"	1.2	-	-	-	-	7	10.1	-	18.3
Total	45	31.4	50.2	21.7	50.9	9.2	61.5	1.9	271.8

Note: Above inventories do not reflect substantial portion of the inventories at the storage being operated near the SET MAKERS (Changxing, Shenzhen, etc.) and also do not include Thomson's inventory. If the actual numbers are reflected, the industry representatives agree that the total would be over 3,500K.

B) Particulars Regarding Line operation status of each company

Philips:

Currently, the CRT sale is extremely difficult. This is because of sharp decrease in production volume and tube purchases caused by excessive SET inventories of the Set Makers in the past few years. Recently, the sales volume of 29" reached 46% of the total sales, but it will take several months to empty the inventories based on the current production volume.

Therefore, stopping production is an absolutely necessary direction. We only need to discuss for how long the production should be suspended.

IRICO:

Considering various circumstances, this company is the most burdened. They have introduced new models (25"DF/29"DF) in the market, but has high defective product rate and high production costs in addition to low sales. The market appears to have almost reached saturation and it seems difficult to expect significant demand. It seems proper action is needed to overcome the situation.

SEG-Hitachi:

The relevant department of the central government is not interested in the industry's current difficult situation and it will probably not get involved in the future either. The CRT market is completely open and competition is severe. Though uniform CRT prices have been set many times, ultimately thorough enforcement is more important than the price.

Given the current circumstance with excessive inventory, a specific schedule or goals should be set (e.g., reduce 29" inventory down below 500K, etc.) and take action. The difficulty should be overcome wisely. The purchase price of GLASS should be lowered. The price for 29"DF was drastically decreased to RMB1,530 (cash/CIF) so 1,500 won could also appear soon. The market situation will absolutely not turn before August and all Set-Makers have plans to either decrease or completely stop production in May and June.

Therefore, the CRT companies should look at the current reality at it is and operate the LINEs (including stopping production) considering their respective situation .

BMCC:

Production on the 29" SF line has been stopped for the past consecutive 101 days and some other models as well have been stopped based on the circumstances. While many industry meetings were held where many agreements were made, few were actually executed as promised. Therefore we must see the error of our past ways. If we use CRT resources effectively we can stabilize the price. The price can even be increased by about 50 won. It is also important to not only set the lowest sales price but also to manage inventory at a reasonable level. We must decisively suspend production considering the current inventory.

Shanghai Yongxin:

How should we determine price for the 29"? We should stabilize the price even if we have to pay the price by stopping production. If the decision is followed, the price could recover up to 1,050 won from the current 1,000 won level. If that happens, it will also be helpful for the 21" & 25" sales. We should set a reasonable price with investment in consideration. We must refrain from sales below cost. At the time of pricing, the price of imported tubes should also be considered.

Guangdong CPT:

If we had carried out what was decided in the Hainan meeting, we would not be in such a difficult situation. We plan to stop all production once we use all the imported production material. We must have the GLASS prices lowered. We also need to lower the import duties by making a request to the government.

LG Changsha:

29" DF line hasn't been in regular operation since the line started production even operating only a few days of production in April. TUBE inventory with the Set Makers has been greatly reduced, but it seems the CRT industry has a greater inventory than last year. It seems inevitable that production must stop.

Samsung SDI:

We need to reflect on the past, prepare necessary countermeasures, and find a future direction.

Top 5 makers (Changhong, KONKA, TCL, Skyworth, VEL) retain 60% of the more than 8,Mil. SET inventory, CRT inventories of SET-Makers are 1.7 Mil, and CRT inventories of Tube-Makers are more than 2.7 Mil. which shows substantial changes in the inventory not only in volume but also in product type compared to the same time last year.

We need to stop production for 2 weeks every month during May, June and July and consume the inventory. A solution by the government appears unlikely so the industry needs to rely on itself to overcome the difficult situation.

We believe setting the price for the next three months will be helpful for purging the inventory as well as for stabilizing the market..

We do not need to worry about imported TUBE[S] shocking the China market as it is not like what it was in the past.

Rather than Samsung or LG, Toshiba or Thomson may be greater variables.

■ Meeting results

- CRT sales price:

29" SF: 1,000 won (till June 12 based on a 6 month promissory note, 1,050 estimated after June 12)

29" HF: 900 won ( " 950 " )

25" MS: 680 " , ? " )

21" MS: 475 " , ? " )

21" MS Export: U\$ 47.50 (FOB port)

- Guidelines for reasonable inventory management (29"SF)

Guangdong CPT - 100K / each line

Shanghai Yongxin - 100K / each line

Philips Nanjing - 60K / each line

Samsung SDI - 30K / each line

BMCC - 70K / each line

LG Changsha - 100K / each line

- GLASS purchases should be made following the results reviewed at the meeting

29" RMB 300-330 P&F

25" RMB 200-220 P&F

21" RMB 140 P&F

We have reached a final agreement at this meeting based on the draft made during the April meeting hosted by SEG-HITACHI, and the translation of the details is as follows.

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Subject: Meeting bulletin

Details: The CRT industry held a CRT company CEO meeting on May 11, 2001. The attendees analyzed in earnest the current CTV and Tube market they are currently facing and reached common understanding on various aspects such as oversupply being much greater than demand, drastic price plunge of CTV SET[S], while the price of main materials like GLASS, etc continues to remain high, and the unreasonably high import duty for large and x-large glass material. The entire industry is facing a deficit in 1Q of 2001.



During the meeting, the attendees studied the 2000 <843> official announcement from the minister of industry again in earnest, and after a sufficient review, they decided at the meeting that the entire industry should cut production from the beginning of May 2001 to reduce inventories (except for export model production). GLASS purchasing price shall be implemented as per the agreement at the meeting.

Representative Signatures of the Meeting Participants:

IRICO Group	: Gyu Doh (Secretary)
Nanjing Philips	: Soo Hwa Lee (General Manager)
BMCC	: Shin Chung Liang (Vice president)
Samsung SDI	: Kwan Tae Choi (Executive Director)
Guangdong CPT	: Choon Gyu Ha (Vice president)
LG Changsha	: Ah Pyung Yang (General Manager)
SEG-HITACHI	: Gook Gyun Yang (Executive Manager)
Shanghai Yongxin	: Hong Yuh Jang (Vice President)

May 11, 2001

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The background for writing the above meeting bulletin is taking the current circumstance with the burden of excessive inventory into consideration, to lower glass prices and to stop price decreases by officially notifying, and adding some impact by using the industry name, the SET Makers and the GLASS Makers of the LINE STOP being implemented by each company.

- End -

## 칼라브라운관 業界會議 結果報告

■日時 및 場所 : '01.05.10~12 上海市 定山湖 太陽島hotel 회의실

■參席者 : BMCC - 양신청 부총경리 범문강 부장 등 2명  
 SEG - 손성전 총경리 양국균 부장외  
 LG장사 - 양아평 부장  
 광동CPT - 하춘규 부총경리 오위헌 부장  
 채흥 - 도규 당서기 위건설 경리  
 PHILIPS - 김강 고문 이수화 영업부 경리  
 상해영신 - 주가춘 총경리 장부총경리  
 번문의 과장외 5명(HOST)  
 SDI - 최관태 상무 왕림봉 과장

## ■ 主要 內容 :

## 가) 브라운관 業體 4月末在庫

단위:10k

	BMCC	PHILIPS	채흥	장사LG	광동CPT	SEG	상해영신	SDI	TOTAL
14"	22.7	-	37.3	-	-	-	-	-	60
21"	5.9	1.6	3.5	2.7	0	2.2	1.2	0.3	17.4
21"DF	0	-	-	-	-	-	-	0.1	0.1
25"	-	8.6	6.4	6	27.4	-	12.3	0.4	61.1
25"DF	-	-	3	-	-	-	-	0	3
29"HF	-	-	-	-	8.1	-	-	0.6	8.7
29"SF	11.7	21.2	-	2.9	15.4	-	37.9	0	89.1
29"DF	3.5	-	-	10.1	-	-	-	0.5	14.1
34"	1.2	-	-	-	-	7	10.1	-	18.3
合計	45	31.4	50.2	21.7	50.9	9.2	61.5	1.9	271.8

注 : 상기 재고는 SET MAKER주변(장흥, 심천 등)에 운영하고있는 창고 재고를 상당부분 반영하지 않았으며 THOMSON재고 미포함. 현실치 대로 반영할 경우 350만개이상 된다고 업계대표가 의견 모으고 있다.

## 나) 業體別 LINE 운영관련 특기 사항

## PHILIPS:

현재 브라운관 판매가 너무나 어렵다. 그이유는 지난 몇년동안 SET 업체 SET 재고과다로 인한 생산 수량격감, TUBE 구매 격감. 최근 29" 판매수량이 전체 판매 수량중 46%수준까지 도달되기는 하나 현재 생산 수량준할경우 몇개월가야 현재 재고를 소진할수 있음.

01000252

따라서 생산 중단은 필히 가야할 방향임. 단 얼마동안 생산중단해야 할지 협의필요.

채흥 :

여러 가지 상황감안 부담이 가장많은 업체이다.  
 신규기종(25"DF/29"DF)도입하기는 하였으나 양품율이 낮고 원가가  
 높으며 정상적인 판매가 되지 않고 있음.  
 시장을 지켜보면 거으 포화상태 이르는것같고 갑작스런 수요기대는  
 어려워 보인다 . 필요한 조치를 취해 역경을 극복하여야 할것 같다.

SEG-HITACHI :

중앙정부 관련부서도 현재 업계어려운 상황에 전혀 관심이 없으며  
 향후에도 관여를 하지않을 것으로판단됨. 브라운관시장은 완전히  
 OPEN된상황에서 철전한 경쟁이 벌어지고 있는상황이다.  
 브라운관 일괄가격을 수차례 정하였지만, 금극적으로 그 가격보다는  
 철저한 집행이 더욱 중요하다.

현재 재고 과다한 점을 감안하면 재고소진할 구체적인 일정 또는 목표  
 를설정하고 (례:29"재고를 50만개 이하까진 줄인다 등)추진해야 한다.  
 역경을 슬기롭게 이겨나가야 한다. GLASS구매 가격을 낮추어야 한다.  
 29"DF 가격이 RMB1530(현금/CIF)까지 급격히 하락돼 1500원도 바로  
 나올지 모른다.8월전까지 절대 시장이 역전되지 않을 것이며 5.6월  
 중 각 SET-MAKER들이 모두 감산 또는 전면 생산 중단계획이 있음.

따라서 브라운관 업체는 현실을 정시하고 업체 자체 현화를 감안  
 LINE운영(생산중단포함)을 해야한다.

BMCC:-29" SF LINE은 지금까지 101일간 줄곧 STOP해 왔으며 기타 기종도  
 경우에 따라 STOP해 왔음.

업계회의는 많이 개최되어 합의된 내용도 많았지만 실제 약속대로  
 집행된것은 많지 않다. 따라서 과거를 반성하여야한다.

브라운관 자원을 제대로 운영한다면 가격은 안정시킬수 있다. 50원  
 정도 가격인상할수도 있다. 최저 판매가격을 제정하는것도 중요하지  
 만 재고를 합리적인 수준에서 운영하여야 한다. 현재재고를 감안하여  
 생산중단을 단호히 하여야한다.

01000253

**상해영신:**

29" 가격을 어떻게 정하여야하는가 ? 생산중단의 대가를 치러서라도 가격을 안정시켜야한다. 결심이 따른다면 현재 1000원내외가격을 1050까지도 회복시킬수 있다. 그렇게 될 경우 21"& 25" 판매에도 도움이 된다. 투자를 감안하여 합리적인 가격을 책정하여야 한다. 적자를 봐가면서 판매하는 것은 삼가여야 한다. 가격제정시 수입구가격도 감안하여야 한다.

**광동CPT:**

해남도 회의결론을 실천했으면 지금이렇게 궁지에 몰리지는 않았을것이다. 일단 수입된 생산자재 소진될때까지 생산하고 그 뒤로는 ALL STOP할 계획이다. GLASS가격을 떨어뜨려야한다. 수입관세도 정부에 요청하여 떨어뜨려야한다.

**장사LG:**

29"DF LINE은 생산개시후 지금까지 정상적인 생산을 거의 못하였으며 4월경우 몇일밖에 생산 못하였음. SET MAKER 보유한 TUBE재고는 많이 줄었으나 , 브라운관 업체 재고는 전년동기대비 많이 신장된 추정되고 있다. 생산 중단은 필히 가야할 방향이다.

**삼성SDI:**

과거를 반성하고, 필요한 대책을 마련하고, 향후 가야할 방향을 찾아야한다.

SET재고가 800만대이상중 5대 MAKER(장흥,KONKA,TCL,SKYWORTH,VEL)가 60%이상 보유, SET-MAKER 브라운관 재고는 170만,TUBE-MAKER 브라운관 재고 270만개 이상등 각종재고는 작년동기대비 수량뿐만 아니라 기종적으로도 많은 변화가 있다.

5.6.7월 적어도 매월2주씩 생산중단하면서 재고를 소진해 나가야한다. 정부에 기대한 문제해결은 가망이 없으며 업계스스로 역경을 극복해 나가야 한다.

향후 3개월 가격을 책정하는것이 재고소진 및 시장안정시키는데 도움이 될수 있다고 사료된다.

수입TUBE 중국시장에 대한 충격은 예전같지 않기 때문에 너무 우려할

01000254



회의기간에 참석자들은 신식산업부 第2000 <843>字 공문을 다시  
진지하게 공부하였으며 충분한 검토를 거쳐 전업계가 오는 2001년  
5월초부터 감산 조치를 취하여 재고 압축할 것을 회의에서 결정  
하였다(수출기종생산 제외). GLASS 구매가격은 회의에서 합의된  
가격으로 집행한다.

회의 참석자 대표 서명:

채흥집단 : 도규 당서기  
남경 PHILIPS : 이수화 경리  
BMCC : 량신청 부총경리  
삼성SDI : 최관태 상무  
광동CPT : 하춘규 부총경리  
장사-LG : 양아평 부장  
SEG-HITACHI : 양국균 총경리 조리  
상해영신 : 장홍예 부총경리

2001-5-11

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상기 회의기요 작성되는 배경은 기존 재고 과다 부담 과대의 현실을 감안,  
각 업체별 기 진행되고 있는 LINE STOP을 공식적으로 업계의 명의를 빌어  
SET MAKETR와 GLASS MAKER에 보다 강하게 통보함으로서 가격 하락을  
저지하고 유리가격을 낮추고하자 하는데 있음.

-이상-

01000256

# EXHIBIT 46

STATE of NEW YORK     )  
                                      )  
COUNTY of NEW YORK    )

ss:

**CERTIFICATE OF ACCURACY**

This is to certify that the attached document, "SDCRT-0087694 – SDCRT-0087698", originally written in *Korean* is, to the best of our knowledge and belief, a true, accurate, and complete translation into *English*.

Dated: January 9, 2013



Seth Wargo  
Consortra Translations

Sworn to and signed before ME this  
9th day of January,  
2013.



Notary Public

JAMES G MAMERA  
Notary Public, State of New York  
No. 01MA6157195  
Qualified in New York County  
Commission Expires Dec. 4, 2014



Color CRT Industry Meeting Results Report
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■ Time / Place: May 10~12, 2001/Shanghai Dingshanhu Taiyangdao Hotel meeting room

■ Attendees:

BMCC - Shin Chung Yang (Vice president), Moon Kang Bum (General Manager) & 2 others  
 SEG - Sung Jeon Sohn (President), Mr. Gook Gyoon Yang (General Manager) & others  
 LG Changsha - Ah Pyung Yang (General Manager)  
 Guangdong CPT - Choon Gyu Ha (Vice president), Wee Hun Oh (General Manager)  
 Irico - Secretary Gyu. Doh, General Manager Gun Sul Wee  
 Philips - Kang Kim (Consultant), Soo Hwa Lee (Sales Team Manager)  
 Shanghai Yongxin - Ga Chon. Ju (President), Mr. Jang (Vice President), Moon Eui Bun (Manager)  
 and 5 others (HOST)  
 SDI - Executive Director Gwan Tae Choi, Mr. Rim Bong Wang (Manager)

■ Main issues

A) CRT company inventories at the end of April

(Unit: 10K)

	BMCC	Philips	Irico	LG Changsha	Guangdong CPT	SEG	Shanghai Yongxin	SDI	Total
14"	22.7	-	37.3	-	-	-	-	-	60
21"	5.9	1.6	3.5	2.7	0	2.2	1.2	0.3	17.4
21"DF	0	-	-	-	-	-	-	0.1	0.1
25"	-	8.6	6.4	6	27.4	-	12.3	0.4	61.1
25"DF	-	-	3	-	-	-	-	0	3
29"HF	-	-	-	-	8.1	-	-	0.6	8.7
29"SP	11.7	21.2	-	2.9	15.4	-	37.9	0	89.1
29"DF	3.5	-	-	10.1	-	-	-	0.5	14.1
34"	1.2	-	-	-	-	7	10.1	-	18.3
Total	45	31.4	50.2	21.7	50.9	9.2	61.5	1.9	271.8

Note: Above inventories do not reflect substantial portion of the inventories at the storage being operated near the SET MAKERS (Changxing, Shenzhen, etc.) and also do not include Thomson's inventory. If the actual numbers are reflected, the industry representatives agree that the total would be over 3,500K.

B) Particulars Regarding Line operation status of each company

Philips:

Currently, the CRT sale is extremely difficult. This is because of sharp decrease in production volume and tube purchases caused by excessive SET inventories of the Set Makers in the past few years. Recently, the sales volume of 29" reached 46% of the total sales, but it will take several months to empty the inventories based on the current production volume.

Therefore, stopping production is an absolutely necessary direction. We only need to discuss for how long the production should be suspended.

IRICO:

Considering various circumstances, this company is the most burdened. They have introduced new models (25"DF/29"DF) in the market, but has high defective product rate and high production costs in addition to low sales. The market appears to have almost reached saturation and it seems difficult to expect significant demand. It seems proper action is needed to overcome the situation.

SEG-Hitachi:

The relevant department of the central government is not interested in the industry's current difficult situation and it will probably not get involved in the future either. The CRT market is completely open and competition is severe. Though uniform CRT prices have been set many times, ultimately thorough enforcement is more important than the price.

Given the current circumstance with excessive inventory, a specific schedule or goals should be set (e.g., reduce 29" inventory down below 500K, etc.) and take action. The difficulty should be overcome wisely. The purchase price of GLASS should be lowered. The price for 29"DF was drastically decreased to RMB1,530 (cash/CIF) so 1,500 won could also appear soon. The market situation will absolutely not turn before August and all Set-Makers have plans to either decrease or completely stop production in May and June.

Therefore, the CRT companies should look at the current reality at it is and operate the LINEs (including stopping production) considering their respective situation .

BMCC:

Production on the 29" SF line has been stopped for the past consecutive 101 days and some other models as well have been stopped based on the circumstances. While many industry meetings were held where many agreements were made, few were actually executed as promised. Therefore we must see the error of our past ways. If we use CRT resources effectively we can stabilize the price. The price can even be increased by about 50 won. It is also important to not only set the lowest sales price but also to manage inventory at a reasonable level. We must decisively suspend production considering the current inventory.

Shanghai Yongxin:

How should we determine price for the 29"? We should stabilize the price even if we have to pay the price by stopping production. If the decision is followed, the price could recover up to 1,050 won from the current 1,000 won level. If that happens, it will also be helpful for the 21" & 25" sales. We should set a reasonable price with investment in consideration. We must refrain from sales below cost. At the time of pricing, the price of imported tubes should also be considered.

Guangdong CPT:

If we had carried out what was decided in the Hainan meeting, we would not be in such a difficult situation. We plan to stop all production once we use all the imported production material. We must have the GLASS prices lowered. We also need to lower the import duties by making a request to the government.

LG Changsha:

29" DF line hasn't been in regular operation since the line started production even operating only a few days of production in April. TUBE inventory with the Set Makers has been greatly reduced, but it seems the CRT industry has a greater inventory than last year. It seems inevitable that production must stop.

Samsung SDI:

We need to reflect on the past, prepare necessary countermeasures, and find a future direction.

Top 5 makers (Changhong, KONKA, TCL, Skyworth, VEL) retain 60% of the more than 8,Mil. SET inventory, CRT inventories of SET-Makers are 1.7 Mil, and CRT inventories of Tube-Makers are more than 2.7 Mil. which shows substantial changes in the inventory not only in volume but also in product type compared to the same time last year.

We need to stop production for 2 weeks every month during May, June and July and consume the inventory. A solution by the government appears unlikely so the industry needs to rely on itself to overcome the difficult situation.

We believe setting the price for the next three months will be helpful for purging the inventory as well as for stabilizing the market..

We do not need to worry about imported TUBE[S] shocking the China market as it is not like what it was in the past.

Rather than Samsung or LG, Toshiba or Thomson may be greater variables.

■ Meeting results

- CRT sales price:

29" SF: 1,000 won (till June 12 based on a 6 month promissory note, 1,050 estimated after June 12)

29" HF: 900 won ( " 950 " )

25" MS: 680 " , ? " )

21" MS: 475 " , ? " )

21" MS Export: U\$ 47.50 (FOB port)

- Guidelines for reasonable inventory management (29"SF)

Guangdong CPT - 100K / each line

Shanghai Yongxin - 100K / each line

Philips Nanjing - 60K / each line

Samsung SDI - 30K / each line

BMCC - 70K / each line

LG Changsha - 100K / each line

- GLASS purchases should be made following the results reviewed at the meeting

29" RMB 300-330 P&F

25" RMB 200-220 P&F

21" RMB 140 P&F

We have reached a final agreement at this meeting based on the draft made during the April meeting hosted by SEG-HITACHI, and the translation of the details is as follows.

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Subject: Meeting bulletin

Details: The CRT industry held a CRT company CEO meeting on May 11, 2001. The attendees analyzed in earnest the current CTV and Tube market they are currently facing and reached common understanding on various aspects such as oversupply being much greater than demand, drastic price plunge of CTV SET[S], while the price of main materials like GLASS, etc continues to remain high, and the unreasonably high import duty for large and x-large glass material. The entire industry is facing a deficit in 1Q of 2001.

During the meeting, the attendees studied the 2000 <843> official announcement from the minister of industry again in earnest, and after a sufficient review, they decided at the meeting that the entire industry should cut production from the beginning of May 2001 to reduce inventories (except for export model production). GLASS purchasing price shall be implemented as per the agreement at the meeting.

Representative Signatures of the Meeting Participants:

IRICO Group	: Gyu Doh (Secretary)
Nanjing Philips	: Soo Hwa Lee (General Manager)
BMCC	: Shin Chung Liang (Vice president)
Samsung SDI	: Kwan Tae Choi (Executive Director)
Guangdong CPT	: Choon Gyu Ha (Vice president)
LG Changsha	: Ah Pyung Yang (General Manager)
SEG-HITACHI	: Gook Gyun Yang (Executive Manager)
Shanghai Yongxin	: Hong Yuh Jang (Vice President)

May 11, 2001

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The background for writing the above meeting bulletin is taking the current circumstance with the burden of excessive inventory into consideration, to lower glass prices and to stop price decreases by officially notifying, and adding some impact by using the industry name, the SET Makers and the GLASS Makers of the LINE STOP being implemented by each company.

- End -

# EXHIBIT 47

## Filed Under Seal

# EXHIBIT 48

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# EXHIBIT 49

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# EXHIBIT 50

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# EXHIBIT 65





June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00102752E - CHU00102754.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is positioned above a horizontal line.

Abraham I. Holczer

Project Manager

[TRANSLATION]

**Meeting Minutes of 2006 Color Tube Industry Presidents' Meeting**

Meeting date: November 21, 2006

Meeting location: Shanghai, Huaxia Hotel

Attending companies and personnel:

BMCC:	Wenchiang Fan, Heng Zheng Guang Ze [Japanese name in Chinese phonetics], Dalin Li, Yongchun Chi, Liman Lu, Hai Huang
Xianyang Irco:	Xiaolin Shen
SEG Hitachi:	Guojun Yang, Jianmin Huang, Peng Guo
Changsha Shuguang:	Yaping Yang, Jing Feng
LPD:	Zaiguan Han, Yingyuan Lu, Jiangnan Ding
Nanjing Huafei:	Jianzhong Sheng, Dezhu Zhang, Minghui Xu
Novel:	Wei Sun, Lei Lee, Qing Ye
Samsung SDI:	Hoo Mok Ha, Chong Huan Lee, Yun Xie, Jing Wen [Korean names in Chinese phonetics].
Thomson:	Dade Han, Peng Xin
Xin Jun:	Xiangjie Hang, Zhiwei Wang

Main content:

Chief Secretary Yang chaired the meeting and begun with opening speech.

Chief Fan spoke: This Presidents' meeting is a key meeting; each of us are here to discuss and study about next year's market trend, strive for stability of the environment and seeking a industry of healthy development.

**Agenda I: Information collector reported the current color TV and color tube industry condition and forecast of the future market (Details refer to *PPT*).**

Chief Secretary Yang: As for the market reports from the information collectors, the following comments were mentioned: In future market reports, impact analysis on *CRT* to color television in flat color television market should be included: In 2007, the *CRT* capacity increase will create significant problems for the sale of *CRT*s, reason being the extremely shortage of materials, glass bulbs price increase due to capacity decrease. Screen capacity decrease by 15.9%, cone capacity reduced by 19.3%. Currently, the issue in which requires urgent resolution is how should *CRT* be developed from now on? How to limit production and protect prices? In order to keep profitability, the *CRT* market in 2007 should realize optimization of capacity and does not need to produce in large volume. Based on understanding, there are a few *LCD* lines starting to expand capacity. *32LCD* screen price reduced by 10%--comparing to the previous *34FS*, the price is even lower. Therefore, the suggestion is: while facing the

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English words found in the original text are *italicized*.

Translator's remarks are indicated in brackets [ ].

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CHU00102752.01E  
Translation

worsening market of *Q1* in 2007 and the declined exports in Christmas 2006, and with next year's Chinese new year being later than usual, color tubes sales will have a longer slow season, the pressure on sales is significant, but, in *Q2* this year, some color tube companies dumped their color tubes with low prices, currently, the color television makers are still digesting these inventories, the impact is very bad. Therefore, it is recommended to the color tube makers to take more action on realistic issues for the sake of the customers and the market.

**Agenda II: How to go into in-depth communication among the Color Tube Industry and together face the challenge of *Q4* 2006 and *Q1* 2007?**

Chief Secretary Yang: As far as *Q4* 2006 and *Q1* 2007 market condition are concerned, how to have self-discipline in the industry? How to respond to *Q1* 2007 while maintaining *Q4* pricing,? Chief Secretary asked for comments from respective companies:

BMCC Heng Zhen: it is more difficult in *Q4* 2006, end of 2005 and beginning of 2006 around Chinese New Year. Production has been adjusted based on what was agreed upon. As far as the added capacities are concerned, how will respective makers collectively resolve this issue? Most important issue is that respective makers should categorize production types.

Samsung Ha: *Q4* 2006 will be over soon, what is more important is to focus on *Q1* 2007 condition. Samsung group's policy is to transfer business unit leaders each year at the beginning of each year, I hope I will not be responsible for the sales of color tubes of China next year. Based on internal information of Samsung, it is shown that 2010 China domestic *LCD* demand exceeded 20M. Currently, domestic *CTV* demand is less than 40M, domestic color tube capacity is over 70M. As to the publicly announced information, Chunghwa Picture Tubes converted 3 production lines, Samsung has no plan currently, I would like to listen to all of your opinion. As for the current supply and demand conditions, respective color tube makers should have mutual information exchanges for the profitability of the company and to jointly formulate a good plan. There is room for reduction on *LCD* cost, but *CRT* material costs are not optimistic. *CRT* industry should consider these elements: strengthen information communication for the overall industry chain. Based on *SDI* internal analysis, *CDT* price was reduced 14%, but the cost only reduced 3%. It is expected that *CPT* will face similar situation as *CDT*. Therefore, it is hereby suggested that makers should seek cooperation in pricing, and jointly resolve the issue of pricing on materials.

Shuguang Yang: In 2007, the company's business plan indicated that corresponding to the decrease in 2006, *Q1* 2007 cost should increase, it was estimated that the price will not be maintained. As for 2007

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*Q1*, when talking about production limits, gray inventory is very large, the reliability and accuracy of said data is yet to be verified. Based on understanding, some of the domestic major color television factories have heavy inventories, normal production can be maintained even if they did not make any purchases for two months.

Chief Secretary Yang: In October 2006, *CPT* production volume was 6.55Mpcs, what should be the production volume in January 2007 in order to satisfy the market, maintain the price and maintaining inventory?

Shuguang Yang: Large screen *LCD* price dropped, under 32 and 34, *CRT* will all be impacted and be pressured.

Samsung Ha: *Q1* condition is worrisome, we need to resolve this during our meeting, whether we can sustain our prices until the end of the year requires industry to take proper measures.

Huafei Sheng: Facing the impact by *LCD*, the industry should reconsider the production limits to protect pricing as suggested before. At the same time of maintaining prices, whether it will provide more entry opportunities for the newly jointed makers, and under these circumstances, we should increase exports and resist imports. *Q3* 2006 industry price increase has brought opportunities for imports, long term consideration should be given as to how to get them to back out. Based on the experience from past years, production is usually greater than sales in the first half of the year, and the second half of the year would have sales greater than production. Based on past experience, respective color tube makers would convert line to speed up production, how should that be controlled?

Irico Sheng: Production limits—if the production is stopped, it will bring opportunities for the new *CPT* factories, how should the industry resist imports? Currently Irico is expanding exports, expecting to export 6M this year. Based on understanding, Northern Europe and Central Europe regions do not have any concept on flat screen yet, the main stream is still *CRTs*. *CRT* market allocation is 70%-80%, flat screen 20% or so. Based on understanding, Northern Europe has 24M *CRT* color television demands. Production limits and price limits are less probable in China. Prices would be loosen just because entering into a slow season, *CTV* makers know the trend and implemented price squeeze strategy. How can the industry have a healthy development? I would like to clarify, currently Irico *K* line has no production plan for the time being due to cost considerations. 28/29 inches will be produced on the old lines.

Thomson Han: Color tube makers are being sandwiched between the suppliers and the customers: the upstream materials continues to increase, downstream *CTV* factories are continually squeezing prices. If the production is limited to protect the price, it will provide opportunities for the newcomers and import tubes. Currently, there is no better way than limit production to cure the condition of oversupply. Dongguan factory ceased production 7 days in November, it is not because of lack of sales, and it was because we did not want to produce too much, hoping to control prices. *Q1* 2007 market is very tough, primary opportunity would be to export. Currently China region capacity is increasing, but capacity in other regions

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worldwide is decreasing. Based on understanding, Western Europe will have demands of 12M-15M next year, part of them will be supplied from China, also agreeable to limit production to protect the price.

Novel Sun: I suggest respective makers study the issues in the market report generated by the information collectors: 1. Provide resolution to respond to the issues for *Q4* 2006 and *Q1* 2007 market, the reason for increased inventories, and why is capacity being added? 2. How to resolve the issue on newly added capacity?

Chief Fan: Regarding EU's anti-dumping, the two makers being sued have already bankrupted. *CRT* production volume in Europe is 11M, among which Thomson has 6M, Samsung 5M, but the demands for Western Europe market is 15M, Russian market demand is 10M.

As for the anti-dumping suit for China's color tubes export to Europe has been dismissed (11/16), but the color television restriction has not been cancelled. If the color televisions are using color tubes from China, whether it is under the restriction is yet to be studied. Since *LCD*'s power consumption is three times as much as *CRT*, UK suggested to sell color television in different levels, and set *LCD* color television as level 3. As to the newly added capacity for Chunghwa and Changzhou Baoma, a strategy can be discussed to categorize them into types.

Xinjun Yang: Regarding to communicate with the newcomers in the industry, should we use conversational format?

Chief Secretary Yang: Changzhou Baoma infringed intellectual property; it is not possible for them to create impact for the industry. As for CPTF, the country was exporting all *CDT* made initially, now Fuzhou can do *CPT* business, and is a major shareholder of Huaxia, the industry hopes to be able to send representative to discuss with them and invite them into the industry to unify standards. Whether CPTM will decrease production, and do they have in-depth understanding of the impact on worldwide market? The reason for the trade differential came from Malaysia is that they shipped the tubes to China, and put them into a set for export, 12% tariff was applied.

Chief Fan, What changes are there for the capacity of CPTM?

Samsung Ha: According to my understanding, CPTM stopped one line, CPTF opened 3 lines, SDIM stopped 1 line in December.

Chief Secretary Yang: The purpose for this meeting is to hope that makers will not suffer a loss by the end of the year, I would suggest to use the strategy of production limitation to protect prices. As far as what was mentioned in the information collectors' report regarding newly added capacity, we will not consider Irico and Changzhou Baoma for the time being, and we will invite CPTF into the industry.

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**Agenda III: What is the opinion from respective makers regarding inventory increases, what is your view on *Q1* 2007?**

Xinjun Yang: Limit production to protect prices in *Q1* 2007, and reconsider total input volume for *Q1* market.

Chief Secretary Yang: Setup production based on sales and do not expand production blindly.

Irico Shen: I would suggest to stop production during Chinese New Year holiday period, with a win/win situation for the company and the employees.

Samsung Ha: Character of slow season: Oversupply, *CTV* factory gets large order (unit price for large order is dropped more than 5%), sign low price contract with *CPT* factory.

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If these types of large orders are accepted, sacrificing industry price will bring significant impact for industry development. When the industry operating environment is not favorable, *CTV* makers' will make harsher demands; for example, Changhong *VMI*'s payment method, such *VMI* methods may change payment due date which will severely impact the healthy development of the industry.

#### **Agenda IV: How to deal with the trend of Q4 materials procurement?**

Chief Secretary Yang:

Screen capacity reduced by 23.7%	Cone capacity reduced by 19.3%
Anci stopped 11 lines and started 14 lines	Anci stopped 4 lines
Xu Electronics stopped 2 lines	Changsha stopped 1 line
Shijiazhuang stopped 1 line	Shijiazhuang stopped 1 line
Total lines stopped 14, started 45	Total stopped 6 lines and started 19

Estimated total annual production of screens 96.44M, Cones production at 86.44M.

Copper price increased. *DY* price increased; especially for 21" it increased by US6. Although color tube price has increased, but in fact it was only converted into materials price ups, the tube itself did not have much profits.

Chief Secretary Yang: First of all, inventory has to be reduced to zero, and ultimately come to an appropriate reserved inventory. Currently, there are 5-6M extra capacity, and the entire industry shall consume this capacity by limiting production. It is recommended to cease production and limit production in order to ease the seriously oversupplied situation for color tubes in 2007, each maker shall consolidate its own condition and stop production for an accumulated 30 days for the whole year.

As to Chief Secretary Yang's recommendation, each has expressed comments as follow:

Novel Sun: Agreed.

Xinjun Yang: Voluntarily reduce capacity, follow the rules of the game, and agree with Chief Secretary's recommendation.

BMCC Heng Zhen: Support the healthy development of the industry as a priority, agree to Chief Secretary's proposal to invite CPTF into the industry. In addition, it is hoped that each company would try to increase export volume, but would need to understand the composition of the current import data of 11M.

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Samsung Ha: The decision to completely stop production is out of his authority, it is to be determined.

Shuguang Yang: Need to be confirmed.

Huafei Sheng: Based on market condition, respective companies shall initialize active and flexible strategy in stopping production; since by stopping production blindly brings significant impact on any company, it can be based on model types and consolidated golden week/summer vacation types of methods to confirm the condition of stopped production.

Irico Yao: Agreed to limit production, and agrees with Huafei's suggestion. Proposed to immediately implement limited production and stop production in *Q4*. As far as Fuzhou, he agreed to Chief Secretary Yang's recommendation, as far as CPTM exported to China close to 6M color tubes, he is considering whether there exists a anti-dumping issue.

Chief Secretary Yang: Material prices are increasing, especially the foreign materials factories, this is a disadvantage to CPTM. Currently, the entire *CRT* industry focus is on China. Domestic cost has the most competitive edge, if the domestic factories suffer losses, the foreign factories for sure will lose money. Therefore, it is proposed to each company accumulatively stop overall production for 1 month, and take up industry monitoring mechanism.

Chief Fan's proposal resolution draft: detailed in *WORD* document.

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## 2006 年彩管行业总经理会议会议纪要

会议时间：2006 年 11 月 21 日

会议地点：上海 华夏宾馆

与会单位及人员：

北京松下 范文强 横枕光则 李大林 迟永纯 卢丽曼 黄海

咸阳彩虹 中小琳

赛格日立 杨国钧 贾建民 郭鹏

长沙曙光 杨亚平 冯靖

LPD 韩在琯 卢滢元 丁江南

南京华飞 盛建忠 张德柱 许明晖

上海永新 孙伟 李雷 叶青

三星 SDI 河侯穆 李昌焕 谢云 文静

汤姆逊 韩达德 辛鹏

新骏 杨向杰 王志伟

主要内容：

杨秘书长主持，致开幕词。

范会长致辞：这次总经理会议是一次关键的会议，大家在此研讨明年的市场形势，力求稳定环境，寻求行业健康发展。

### 议题一：信息员代表汇报当前彩电彩管行业现状及今后市场的预测（详见 PPT）。

杨秘书长：针对信息员的汇报，提出如下意见：以后的市场汇报应增加平板彩电市场对 CRT 彩电的冲击分析；07 年 CRT 产能增加，会对 CRT 销售产生重大问题，原因在于材料奇缺，玻壳因产能下降而涨价。屏的产能下降 15.9%，锥的产能下降 19.3%。现在急需解决的问题，CRT 今后该如何发展？如何限产保价？为了保持利润，在 07 年的 CRT 市场应实现产能最优化而不需大量生产。据了解，目前有几条 LCD 线上马，产能扩大。32LCD 屏价格下降 10%，与以前 34FS 相比，价格还要便宜。因此，建议面对 07 年 Q1 市场恶化，06 年圣诞节出口萎缩的局面，明年春节比较晚，彩管销售淡季较长，销售压力很大。但是，今年 Q2 有些彩管企业低价抛售的彩管，现在彩电厂还在消化这些库存，影响很不好。所以，建议各彩管厂家为了客户和市场多做一点实事。

### 议题二：彩管行业如何深入沟通协作，共同迎战 06 年 Q4 和 07 年 Q1

杨秘书长：针对 06 年 Q4 和 07 年 Q1 的市场情况，行业如何自律？维持 Q4 的价格，如何应对 07 年 Q1？请各个公司发表意见。

北松 横枕：06 年 Q4 比较困难。05 年年底和 06 年年初春节前后，已按约定调整生产。对于新增生产能力，各家如何联合解决此问题。最重要的一点是，各家尽量区分生产品种。

三星 河：06 年 Q4 即将过去，更重要是关注 07 年 Q1 的情况。三星集团规定每年年初事业部门领导调任，我希望明年不再负责中国彩管销售任务。据三星内部资料显示，2010 年中国国内 LCD 需求超过 2000 万。目前国内 CTV 需求在 4000 万以下，国内彩管产能在 7000 万以上。针对刚发表市场资料，中华映管改造 3 条生产线，三星暂时没有方案，想听听各家的意见。针对目前供求关系情况，各彩管厂家应互相交流信息，为求公司利润，共同谋划好的方案，LCD 在成本上有下降的空间，而 CRT 资材价格不容乐观，CRT 行业应考虑此方面因素，加强整个产业链的信息沟通。据 SDI 内部分析，CDT 价格下降 14%，而成本仅下降 3%，预计 CPT 将出现与 CDT 类似情况。因此，建议各家在价格方面寻求合作，共同解决材料价格问题。

曙光 杨：07 年公司事业计划相对 06 年有下降，07 年 Q1 成本上涨，预计不能保价，针对 07

年 Q1, 谈限产问题, 灰色库存很大, 这个数据的可靠性和准确性需要再考究。据了解, 国内一些大彩电厂库存大, 即使两个月不采购, 也可维持正常生产。

杨秘书长: 06 年 10 月份 CPT 产量 655 万只, 07 年 1 月份产量应为多少才能满足市场, 保价保库存?

曙光 杨: 大屏幕 LCD 价格下降, 32 34 以下 CRT 都会受到冲击, 受到积压。

三星 河: 担心 Q1 的情况, 我们开会需要解决, 我们是否可以把价格挺到年底, 需要行业措施。

华飞 盛: 面对 LCD 的冲击, 提议的限产保价措施, 行业需要重新思考一下, 保价的同时是否给新入行者更多机会增加了进口, 在此情况下, 我们应增加出口, 抵挡进口。06 年 Q3 行业涨价给进口带来了机会, 如何让其退出, 应做长远的考虑。根据往年的经验, 上半年是产大于销, 下半年销大于产。按以往经验, 各彩管厂会改造提速。如何控制?

彩虹 申: 限产——如果停产会给新增 CPT 厂带来机会, 行业应如何抵制进口? 彩虹目前扩大出口, 预计今年出口 600 万。据了解, 北欧 中欧地区消费者对平板无概念, 主流还是 CRT, CRT 市场份额 70%-80%。平板 20%左右。据了解, 北欧市场有 2400 万 CRT 彩电需求。中国限产限价可能性小, 因为刚进入淡季, 价格就有所松动, CTV 厂家掌握了动向, 实行了压价策略。行业应如何健康发展? 澄清一下, 日前彩虹 K 线因考虑成本原因, 暂无生产计划。28/29 英寸在老线上生产。

汤姆逊 韩: 彩管厂正处于供应商与客户夹缝之间, 上游材料在不断涨价, 下游 CTV 厂在不断压价。如果限产保价, 会给新加入者和进口管机会。日前供大于求的情况, 不采取限产, 也没有更好的办法。东莞工厂 11 月停产 7 天, 不是因为卖不出去, 而是不想生产太多, 希望控制价格。07 年 Q1 市场很困难, 主要机会是出口。目前中国地区产能在增加, 而全球其它地区产能在减少。据了解, 明年西欧的需求在 1200-1500 万, 部分来自中国, 对于限产保价表示赞同。

永新 孙: 建议各家对信息员的市场汇报提出的问题进行探讨: 一 针对 06 年 Q4 07 年 Q1 市场提出解决问题的相应对策, 库存增加原因, 为什么新增产能? 二 如何解决新增的产能?

范会长: 针对欧盟反倾销, 起诉的两家已经倒闭, 欧洲 CRT 产量有 1100 万, 其中汤姆逊 600 万 三星 500 万, 而西欧市场需求 1500 万, 俄罗斯市场需求 1000 万。

有关中国彩管出口欧洲的反倾销已经撤消 (11/16), 但是对彩电的限制还没有取消。如果彩电来自中国彩管, 是不是还是受到限制, 还需要研究。鉴于 LCD 能耗是 CRT 的三倍, 英国建议彩电进行分级销售, 将 LCD 彩电定于三级。针对新增产能中华映管和常州宝马, 实行分品种协商策略。

新骏 杨: 针对行业的新加入者, 是否采用对话形式。

杨秘书长: 常州宝马因侵犯知识产权, 对行业不可能造成影响。福州中华, 当初国家全部外销, 做 CDT。现在福州可以做 CPT 业务, 又是厦华的大股东。行业希望能够派代表与他们协商, 邀请其入行, 统一规范。华映马来西亚是否会减产, 对全球的影响应深入了解? 贸易逆差来自于马来西亚的原因, 他们出口管子到中国, 再作成整机再出口, 要收取 12% 的关税。

范会长: 华映马来西亚有什么产能上的变化?

三星 河: 据了解, 华映马来西亚停 1 条线, 中华福州开 3 条线。三星 马来西亚 12 月份停 1 条线。

杨秘书长: 本次会议的目的是希望各家在年底不亏损, 建议采取限产保价的策略。

对于信息员报告中提到新增的产能, 目前可不考虑彩虹和常州宝马。中华福州邀请其入行。

### 议题三: 针对库存上升, 07 年 Q1, 请各家提提看法?

新骏 杨: 07 年 Q1 限产保价, 对于 Q1 市场整体投放量, 需再整体考虑。

杨秘书长: 以销定产, 不盲目扩大生产。

彩虹 申: 建议春节期间停产, 来限产保价, 给公司和员工带来双赢的局面。

三星 河: 淡季特点: 供大于求, CTV 厂拿大单 (大单价格下降 5% 以上) 与 CPT 厂低价签定合

同。如果接受此类大单，牺牲行业价格，将会给行业发展带来很大影响。同行业经营环境不善，CTV 厂家要求越来越苛刻，例如长虹 VMI 结算方式，这些例如 VMI 方式或者变更付款期限，都严重影响了行业的健康发展。

#### 议题四：如何针对 Q4 材料采购形势？

杨秘书长：

屏产能下降 23.7%

安彩停 11 条 开 14 条

旭电子 停 2 条

石家庄 停 1 条

共计停 14 条 开 45 条

锥 产能下降 19.3%

安彩停 4 条

长沙停 1 条

石家庄停 1 条

共计停 6 条开 19 条

预计全年屏生产 9644 万，锥生产 8644 万。

铜价格上涨。DY 价格上涨，尤其是 21 上涨 6 个美金。彩管虽然涨价，其实只是转移到材料涨价，本身没有赚多少钱。

杨秘书长：首先要作到无库存，然后作到适当的储备库存。目前多余的 500-600 万产能，整个行业采取限产方式把它消耗掉。建议为了缓和 2007 年彩管严重供大于求的局势，会议提议停产限产，每家结合自身情况全年整体停产累计 30 天。

对于杨秘书长的建议，各家表态：

永新 孙：表示赞同。

新骏 杨：主动将产能降低，遵守游戏规则，赞同秘书长的意见。

北松 横枕：首先支持行业的健康发展，对于秘书长提出的邀请中华福州入行表示赞同。另外，希望各公司尽量增加出口，针对目前的进口数据 1100 万，需要了解一下构成。

三星 河：完全停产超过他的决策范围，待定。

曙光 杨：需要再确定。

华飞 盛：根据市场情况，各公司采取主动灵活的停产策略，因为任何公司盲目的停产影响很大，可根据品种和结合黄金周/复假等方式来确定停产情况。

彩虹 姚：对于限产表示赞同，同意华飞的建议。提议 Q4 马上实施限产 停产。对于福州的事宜，赞同杨秘书长的建议，针对中华马来西亚出口到中国将近 600 万的彩管，是否考虑存在反倾销问题。

杨秘书长：现在材料涨价，尤其是国外的材料工厂，这个对中华马来西亚不利，目前整个 CRT 产业的重心在中国。国内成本最具有竞争力，如果国内亏损，国外厂家一定亏损。所以提议全年各个公司累计整体停产 1 个月。并采取行业监督机制。

范会长的提议的决议草案，详细 WORD 文件。

# EXHIBIT 66

## Filed Under Seal

# EXHIBIT 67



June 20, 2012

**Certification**

**Park IP Translations**

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Chinese into English of the document with bates numbers range:  
CHU00102864E - CHU00102865E.

A handwritten signature in black ink, reading 'Abraham I. Holczer', is written above a horizontal line.

Abraham I. Holczer

Project Manager

[TRANSLATION]

To: Chief Wen-Qiang Fan, Chief Secretary Guo-Jun Yang

Xianyang Irico: Daoqin Xing, Xiaolin Shen

Samsung *SDI*: Hoo-Mok Ha, Yin-Zhi Huang

SEG Hitachi: Chenqun Li, Yufeng Wang

Changsha *LG*: Zheng-Yuan Ha, Yaping Yang

Nanjin Huafei: Yinhua Zhang, Jianzhong Sheng

Thomson: Dade Han, Xiangjie yang

Novel: Wei Sun, Zhiping Xu

BMCC: Heng Zhen Guang Ze [Japanese name in Chinese phonetics] Dalin Lee

CPT: Jing-Song (Jason) Lu, Xiao-Yan Liu

Color Tube Industry Association Presidents' Meeting Notice (No.200701)

Based on the spirit of the Shanghai President's meeting held in December 2006, through discussion, with consent from Chief Wenqing Fan, the 8 major color tubes industry association will hold Presidents' meeting on January 23, 2007 (Tuesday) in Shann'xi Xi'an, detailed as follows:

I. Date: January 23, 2007

09:00 -- 10:30 Current industry condition report  
10:30 -- 11:00 Lead attendees' speech  
11:00 -- 11:50 Lead attendees' workshop  
12:20 -- Lunch

II. Location: Shannxi Xi'an Datang Furong Garden Fanglin Hotel

III. Attendees:

Especially inviting CPTF (Fuzhou factory) to attend this meeting

Respective companies' president, company leader in charge of sales, sales department head and industry information collectors

IV. Meeting chair:

Chief Secretary Guojun Yang

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00102864.01E  
Translation

V. Agendas for the meeting:

1. Current condition of color television and color tubes and quarterly, 2007 market trend forecast report (30 minutes)
2. Solidified meeting spirit from the December Shanghai Presidents' meeting and looking back (20 minutes)
3. How to have an in-depth communication and cooperation in the color tube industry to welcome the 2007 market jointly (10 minutes to each speaking party from respective companies).
4. Leader attendees workshop in how to pursue long term development and relative topics on *CRT* color television (50 minutes)

VI. Requirements for the meeting

1. Each company shall send company leaders for timely attendance.
2. Please prepare advance materials for speech, no audio recording during meeting, meeting contents shall not be leaked to outside.
3. Meeting fee based on *AA* policy.

VII. Respective information collector for color tube industry shall provide attending leaders' list to Irigo group sales company marketing department by January 16<sup>th</sup>, 2007, Irigo shall arrange for airport transportation. Thank you for your cooperation!

Contact: Irigo Group Sales Company Jun Yao

*TEL*: 029-33333333 13309106828

*FAX*: 029-33333399

*EMAIL*: [yj-xs@ch.com.cn](mailto:yj-xs@ch.com.cn)

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

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CHU00102864.02E  
Translation



**Eight Major Color Tube Industry Association**

January 15, 2007

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

CONFIDENTIAL – GRAND JURY MATERIAL

CHU00102865E  
**Translation**

致：范文强会长、杨国钧秘书长

咸阳彩虹 - 邢道钦、申小琳

三星 SDI - 河候穆、黄银植

赛格日立 - 李陈群、王宇峰

长沙 LG - 河正源、杨亚平

南京华飞 - 张银华、盛建忠

汤姆逊 - 韩达德、杨向杰

上海永新 - 孙 伟、徐志平

北京松下 - 横枕光则、李大林

中华映管 - 吕镜松、刘晓燕

## **彩管行业协会总经理会议通知**(编号 200701)

根据 2006 年 12 月上海总经理会议精神，经商范文强会长同意，八大彩管行业协会拟定于 2007 年 1 月 23 日(星期二)在陕西西安召开总经理会议，具体如下：

### **一、 时间：2007 年 1 月 23 日**

09：00～10:30 行业现状通报

10：30～11：00 与会领导发言

11：00～11：50 与会领导座谈

12：20～ 午宴

### **二、地点：陕西 西安大唐芙蓉园芳林苑酒店**

### **三、与会人员：**

本次会议特邀请中华映管（福州厂）参加会议

各公司总经理、主管销售的公司领导、营销部长及行业信息员

### **四、会议主持：**

杨国钧秘书长

### **五、会议议题：**

- 1、 当前彩电彩管行业现状及一季度、07 年市场形势预测汇报（30 分钟）；
- 2、 12 月上海总经理会议精神的落实及其回顾（20 分钟）；
- 3、 彩管行业如何深入沟通协作，共同迎接 07 年市场（各公司发言 10 分钟）；
- 4、 与会领导座谈如何谋求 CRT 彩电的长远发展等相关议题（50 分钟）

### **六、会议要求：**

- 1、 请各公司领导准时出席；
- 2、 请提前做好发言的资料准备，会议期间不得录音，会议内容不得外泄；
- 3、 会务费用 AA 制；

### **七、请各位彩管行业信息员在 07 年 1 月 16 日前将参加会议领导名单反馈到彩虹集团销售公司市场部，彩虹将安排接送机服务。谢谢合作！**

联系人：彩虹集团销售公司 姚 军

TEL：029-33333333 13309106828

FAX：029-33333399

EMAIL:yj-xs@ch.com.cn

八大彩管行业协会

2007 年 1 月 15 日

# EXHIBIT 68

## Filed Under Seal

# EXHIBIT 69

## Filed Under Seal

# EXHIBIT 70

## Filed Under Seal

# EXHIBIT 71

## Filed Under Seal

# EXHIBIT 72

## Filed Under Seal



# EXHIBIT 73

## Filed Under Seal

# **Exhibit 74**

STATE OF NEW YORK  
CITY OF NEW YORK  
COUNTY OF NEW YORK

CERTIFICATION

I, Dan McCourt, as an employee of TransPerfect Translations, Inc., do hereby certify, to the best of my knowledge and belief, that the provided Chinese into English translation(s) of the source document(s) listed below are true and accurate:

- IRI-CRT-00024212-IRI-CRT-00024215

TransPerfect Translations, Inc., a translation organization with over 90 offices on six continents, is a leader in professional translations. TransPerfect Translations, Inc. has over twenty years experience translating into the above language pair, its work being accepted by business organizations, governmental authorities and courts throughout the United States and internationally.

TransPerfect Translations, Inc. affirms that the provided translation was produced in according to our ISO 9001:2015 and ISO 17100:2015 certified quality management system, and also that the agents responsible for said translation(s) are qualified to translate and review documents for the above language pair, and are not a relation to any of the parties named in the source document(s).



Dan McCourt, Project Assistant

Sworn to before me this  
Monday, August 28, 2023



Signature, Notary Public



Stamp, Notary Public

[handwritten text is indicated in italics]

*February 14, 2003 pm 2:30 (Friday) Third small meeting room*

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Administrative office meeting

Attendees: Ma Jinquan, Tao Kui, Xing Daoqin, Guo Mengquan, Zhang Shaowen, Niu Xin'an

Non-voting attendees: Persons in charge of the Planning and Development Department, the Technology and Quality Department, Technical Center and Office

Chaired by: Ma Jinquan

Recorded by: Wei Xiaojun

Topic: Discussion on the Relevant Work at the Beginning of the Year (February)

Agenda and Contents:

Ma: Start by discussing the super large screen tubes project

Zhang: 1. The sources of the technology for the oversize screen tubes are Hitachi, Mitsubishi and Thomson, all have different characteristics and cooperation advantages. Issues were stated; we will choose either Mitsubishi or Thomson for bringing in the large tubes technology.

2. 32", 34" resolution → pixel → pitch, it is planned to select the half piece of tight type shadow mask, pitch 0.75~0.60

3. Regarding the sizes of the tube types, consider 32" of 16:9 and 34", 36" of 4:3 at the same time.

Li Danghui: 1. I learned from relevant materials that the leading product for 37" after 5 years will be PDP, and the prospect of 36" CRT is unclear.

Ma: 1. Comparing 32" and 36" from cost and the national effective sizes, it is better to select 36".

2. The medium resolution is sufficient for household use, select the pure screen and engage in the technology for very fine tubes.

Discussion...

Xu: 1. Discuss from the perspective of feasibility.

Decided upon Discussion: (1) Conduct the argument and demonstration on bringing in the oversize screen tubes technology, dissect the tubes, and visit the companies.

(2) The Planning and Development Department shall bring up a feasibility report.

[handwritten text is indicated in italics]

*February 14, 2003 pm 2:30 (Friday) Third small meeting room*

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Xu Quancheng: 1. Explain the situation of the argument and demonstration on the reported projects of 2003 technological modification and measures (see the attachment)

2. CRT Plant One's 15" PF line transformation plan .

3. Electron gun 15" PF matching support transformation plan

Decided upon Discussion: the above three projects.

Tao: 1. Adjust the equity structure of Irco Fluorescence Company, and plan to adjust to give 10% of the 45% shares held by the Group to the Tertiary Co., and the Group will account for 35%, so as to facilitate the separation of the Tertiary in the logistics.

Xu Quancheng, 1. The project of the technological modification on the cold repair of the furnace of the Glass for treating tubes, with an investment of RMB 7.64 million.

Decided upon Discussion: We can prepare and keep it as long as possible.

Liang Tianxiang: Report on the evaluation of the Party Committee in 2002. The situation of the evaluation

Advanced Party Committee: the First Factory, the joint-stock company, the electron gun factory, the glass factory

Directly affiliated branch: The part factory, the shadow mask factory

Advanced branch: Outstanding Party members are evaluated and selected by the basic level, with 18 branches and 46 Party members.

Decided upon Discussion: Agree, the award standard is the same as last year.

Niu Xin'an: 1. The notice of Shaanxi Electronics Association: Irco recommends Chief Ma for "May 1" Labor Award, which will be reported to Shaanxi Province for balancing and election, and to further grab a shift.

Ma: 1. I am already a deputy to the National People's Congress, it is better to recommend other leaders and comrades.

2. We would rather abandon this quota than give it to me.

Decided upon Discussion: Agree with Chief Ma's proposal to recommend Comrade Tao Kui, and recommend a shift from a large branch factory.

Wei: 1. The initial situation of the evaluation of the industrial advancement

[handwritten text is indicated in italics]

*February 14, 2003 pm 2:30 (Friday) Third small meeting room*

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Decided upon Discussion: (1) Agree with the list of advanced individuals of all units, and the grades of the awards for the achievements in modernized management.

(2) Management award:

Gold Award: The glass factory

Silver Award: The Joint Stock Company and CRT Plant One

Bronze Award: The fluorescence company, the sales company, the group office.

2. The situation of preparing the matters related to the agenda of the workers' congress and summary commendation meeting.

Decided upon Discussion: (1) Agree to hold a meeting in the club at 8:30 AM on February 24, [illegible], participants, hold an evening party in the evening.

Guo Mengquan: The matter of the planned implementation of the planned price of parts for 2003 internal supporting materials.

Discussion...

Xing: (1) Explain the situation of undertaking contracts of production and operation by respective units in 2003, undertaking by using the indicators of completion in 2002 as the benchmark. Assess the undertaking by indicators of class A and class B.

(2) Some issues in negotiations with Thomson

- Share percentage: Irico controls the shares, Thomson's share is more than 25%
- Joint venture structure: Establish a joint venture company and set up factories in the southern and northern parts.
- Register the joint-venture company in Xianyang
- The inclusion of the old glass factory in the joint-venture company will wait to be discussed in the next step

(3) The situation of preparing the market simulation and parts and components export meeting (in the afternoon of the 24th)

Niu: (1) Report on the matters of the school management:

- Regarding student fees, the children of [illegible] Company and [illegible] factories do not pay→ General Factory undertakes to pay.

[handwritten text is indicated in italics]

*February 14, 2003 pm 2:30 (Friday) Third small meeting room*

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- The other part of the single employee should be borne by the respective unit.
- It is planned that the school separates high school from middle school and elementary school.  
High school is independent and operates by simulating market.
- The school plans to recruit two foreign teachers.
- Request that volunteers provide sponsorship for the ceremony of coming to town in Shaanxi, otherwise no volunteers will be sent.
- It is planned to recruit two teachers for the elementary school

(2) Restructuring of the company, enterprises becoming legal entities, and organizing the units. First register the power plant and the electron gun factory. Retain an intermediary company to help operate the shareholding of the management level.

Decided upon Discussion: Agree with the above two proposals.

Chief Ma: 1 Chief Guo and I will go to Hainan on the 16th to attend the industry meeting. Urgently prepare and implement all work.



2003 年 2 月 14 日 PM 2:30 星期五 三小会议室

### 引政办分令

参加人：马金泉、何明、邢道钦、郑道友、张少文、牛明安

列席：规划发展部、杜振记、杜坤心、郑道友

主持：马金泉

记录：魏小军

议题：年初(二月)相关工作研讨

议定内容：

马：首先讨论超屏幕项目

张：1. 超屏幕项目目前技术有日立、三星、索尼、汤姆逊、  
公司各有特点，合作优势，问以引用所述，引进大型万  
幕技术在三星和汤姆逊中选择。

2. 32"、34"分辨率 → 需求 → 节距 拟选择半张或单张  
节距 0.75 ~ 0.60

3. 屏幕尺寸以考虑 16:9 的 32"、4:3 的 34"、36"

李道合：1. 从有定条件反映 5 年后 37" 的屏幕是 POP 36" CRT  
前景不明朗。

马：1. 在 32" 与 36" 比较从成本、国家有尺寸限制 36" 较好。

2. 中分辨率、家庭用足敏、选择电源、支持旧万幕技术。

讨论……

经：1. 从引引方面进行论述。

讨论决定：(1) 引进超屏幕技术论证，解剖万子，考察公司。

(2) 规划发展部拿出引引报告。



年 月 日 星期

徐金成: 1. 2003年拟在拉塔中报12月15日讨论时已说明 (见附件)。

2. 拟在-丁 15" PF线及数道方案。

3. 电子线 15" PF线无...

讨论决定: 上述三项目。

附: 1. 拟在利九港公司可控股数比例, 拟把该团占45%股份。  
拟在兰兰公司10%股份, 即占股35%。便于兰兰后助的分割。

徐金成: 1. 拟在拉塔中报12月15日讨论时已说明, 投资764万。

讨论决定: 予以作准, 予以保留。

张天解: 02年定章讨论时已12月15日讨论时:

先进选: -丁, 电子线, 电子线, 破动工。

直身2P: 另议, 10月15日。

先进2P: 优秀党员由党后评选, 18个2P, 46名党员。

讨论决定: 同意, 党后评选与去年一样。

牛和安: 1. 陕西电子会通知, 拟在拉塔中报马总"五一"劳动奖章, 拟到陕西省专事街, 选举, 再拟选一个班。

马: 1. 我已是全国人大代表, 最好是推荐其子马和安同志。

2. 这个名额宁屋座, 也不必给我。

讨论决定: 10月15日讨论时已说明, 拟在拉塔中报马总, 从又金厂机带一个班。

附: 1. 拟在先进评选时予以讨论。



年 月 日 星期

讨论决定: (1) 10月各样化先进个人名单, 和孔德化系统时学奖励机制。

(2) 孔德化:

金尧: 碰动了

银尧: 股份公司, 创石一丁

铜尧: 楚尧公司, 铜尧公司, 华国办。

又, 孔德化及陈依林讨论会议孔有尧2重准备情况。

讨论决定: (1) 10月24日上午8:30, 在佳乐印公司 讨论, 参加人员, 晚上也讨论。

郭通权: 03年内从材料, 零件, 制定计划, 计划, 研究。

讨论……

郭: (1) 03年各样化先进个人名单, 以02年已成情况为准, 老孔尧尧, 金尧, 银尧, 铜尧, 楚尧, 创石一丁。

(2) 与陈依林讨论计划中的一些问题。

• 股比: 创石控股, 陈依林公司大于25%。

• 合资公司架构: 成通公司, 在南方, 北方建厂。

• 合资公司注册在成通。

• 老碰动了进入合资公司, 待下一步再谈。

(3) 挖机, 车和零件, 讨论会议, 讨论 (2411下午)。

牛: (1) 江限学校, 讨论:

• 学校收费, 楚尧公司, 创石一丁, 创石一丁, 创石一丁。



年 月 日 星期

- 单职工和另外一部分由各单位承担。独立
- 拟学校化高中，与初中分开，高中拟按系统运行。
- 学校拟聘两各外教老师。
- 拟求自愿者事进入城或要求赞助。否则，只以有希望。
- 拟以小学招聘两各教师

(2) 公司规划，在整体化、化机构。先注册动力厂、电机厂。后  
可考虑参股请一个中介公司帮助运作。

讨论决定：同意上述两个提议。

马总：！我在印飞16日到海有开引引号。书记工作照原有在是。

# **Exhibit 75**



September 25, 2018

**Certification**

**Park IP Translations**

**TRANSLATOR'S DECLARATION:**

I, Jennifer Brooks, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with the bates number range of: IRI-CRT-00003490 - IRI-CRT-00003497

A handwritten signature in blue ink, appearing to read 'Jennifer Brooks', is written over a horizontal line. The signature is stylized and fluid.

Jennifer Brooks

Project Number: BBLLP\_1809\_021

15 W. 37th Street 8th Floor  
New York, NY 10018  
212.581.8870  
ParkIP.com



**Irigo Group Corporation  
Audit Department Document**

Cai Shen [2001] No. 1

Report on the Audit Situation of Irigo (USA) Inc.

Irigo Group Corporation:

In accordance with the instructions of the Group Corporation's leaders, this department organized a three-person audit group lead by Department Chief Zhang Xingxi, and on 27 April 2001, this department issued an audit notice via fax to Irigo (USA) Inc. On 27 May, the audit group arrived in Fremont, California, US and immediately launched audit work. First, the audit group required the company's general manager, Liu Feng, to provide materials required for conducting an audit, such as accounting documents, account books, and financial reports, going back to the time of the company's establishment. However, General Manager Liu Feng stated that prior to 1998, the company's financial affairs were controlled by American stockholder Huang Xueli, and the accounting materials were not handed over to Irigo when the American party divested in 1998, so they could not be provided. The accounting materials from after 1998 were transferred to INB Co. on 10 April 2001 by the company, and all materials of the original company are owned by the assignee. Therefore, any request to provide these must be agreed to by the assignee. After multiple audit group negotiations, Liu Feng only provided the following materials:



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IRI-CRT-00003490

1. Stubs of checks externally issued by the company from 1 January 1998 to 30 April 2001;
2. Bank statements from 1 January 2000 to 30 April 2001;
3. Irico (USA) Inc. transfer contract;
4. Resolution of the Irico (USA) Inc. second board of directors (copy);

Because Liu Feng made an unauthorized transfer of Irico (USA) Inc. to the United States' INB Co. on 10 April 2001, and because Liu Feng did not provide the accounting materials related to business activities, such as financial statements and accounting documents, required by the audit, it was not possible to meet the most basic conditions for an audit, and subject to the limitations of lawful duties, authority, and inspection methods, it was not possible to uncover the true situation reflected by the accounting report forms of the audited Irico (USA) Inc. or to issue complete, accurate audit findings, making it impossible to carry out normal audit work. The audit group could only conduct an investigation of some of the circumstances of Irico (USA) Inc. based on the materials provided by Liu Feng, such as check stubs and partial bank statements and the Irico (USA) Inc. transfer contract.

Over the course of the investigation, the audit group mainly conducted the following work with regard to the materials provided by Liu Feng:

1. One-by-one registration of the provided expenditure check stubs since 1998;
2. Categorization of the registered expenditures according to the economic details listed on the check stubs;
3. One-by-one verification of the bank statements from 1 January 2000 to 30 April 2001;
4. Verification of all company credit card expenditures exceeding US\$1000 since 1998.
5. Examination of the company transfer contract he signed, and consultation with a local law firm on the contract details.
6. Investigation and consultation with the relevant United States governmental departments on the basic status of the assignee INB Co. and its stockholders and corporate credit standing.



### I. Basic conditions of the company

Irico (USA) Inc. is a joint venture company established by the Group Corporation and an American party, located in Fremont, California, US. The company was established in July 1995, with registered capital of US\$1.75 million, wherein: Import/Export Caihong Co. investment was US\$600,000 cash, for 34.3% equity; Irigo (Hong Kong) Co. investment was US\$800,000 cash, for 45.7% equity; Huang Xueli invested US\$125,000 cash and delivered US\$50,000 in dry shares, for a total of US\$175,000, for 10% equity; and Huang Maiké invested US\$175,000 cash, for 10% equity. In October 1995, Irigo Group Corporation sent Liu Feng and Zhu Jian to the United States. Zhu Jian did not go to the United States after March 1997 due to visa problems.

As reflected by Liu Feng, due to extraordinary difficulties in cooperation with the Huang siblings, foreign parties in the joint venture, an agreement was reached with the foreign parties on 26 February 1998, the American parties divested from the company, and US\$1 million of Irigo capital was returned in 1998. At this point, the company was independently run by Irigo, with Liu Feng being solely responsible. During the audit investigation, it was learned that Liu Feng gained US permanent resident status (green card) on 20 July 2000. On 10 April 2001, General Manager Liu Feng made an unauthorized transfer of the company to the United States' INB Co.

### II. Financial revenue and expenditures of the company

#### 1. Situation prior to 1998

Because Liu Feng could not provide the company's accounting materials prior to 1998, it was not possible to check operations before 1998.

#### 2. Situation since 1998

According to the check stub materials provided by Liu Feng, from January 1 1998





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to 30 April 2001, the company incurred costs totaling US\$914,670.45.

(2) According to the company's deposit bank check stubs provided by Liu Feng, from 1 January 1998 to 30 April 2001, the company purchased fixed assets totaling US\$40,417.48.

(3) Because the company did not provide bank statements for 1998 and 1999, it was not possible to check the company's operating revenue, fund investment income, and interest revenue for 1998 and 1999. According to the 2000 and 2001 bank statements of the company's deposit bank provided by Liu Feng, the company's cumulative main business revenue from 1 January 2000 to 30 April 2001 was US\$122,943.00, and its cumulative main business costs were US\$112,896.00.

(4) According to the 2000 and 2001 bank statements of the company's deposit bank provided by Liu Feng, the company's interest revenue from 1 January 2000 to 30 April 2001 was US\$12,105.59. This included:

2000: US\$10,444.06

2001: US\$1,661.53

(5) According to the company's deposit bank statements and fixed assets lists provided by Liu Feng, as of 30 April 2001, the company's net assets were US\$119,581.42. This included:

Net value of fixed assets: US\$30,364.17

Bank deposits: US\$89,217.25

III. Investigation of contract

On 10 April 2001, Irico (USA) Inc. was transferred to the United States' INB Co. by Liu Feng. Based on the transfer contract provided by Liu Feng, the audit group commissioned Mr. Shi Xiaodong, general manager of a San Francisco container services company established by China Ocean Shipping (Group) Company, to conduct a legal consultation with the United States' Morrison & Foerster Law Firm on this contract.

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Zhao Qimin of this law firm believed that the contract signature procedures and basis of the contract itself complied with US law.

Given the overall opinions of the lawyers, the audit group believes the transfer contract signed by Liu Feng ran counter to the wishes of the Group Corporation and damaged the interests of the Group Corporation in the following ways:

1. It did not comply with the spirit and intentions of the 9 March 2000 Irco (USA) Inc. board meeting resolution. The Irco (USA) Inc. 9 March 2000 board meeting fully authorized Liu Feng to transfer Irco (USA) Inc. for a price of US\$1 million, with recovery of the transfer funds by 31 December 2000 at the latest; it did not require the precondition of Irco Group Corporation providing US\$700,000 profits in annual support, as written in the contract signed by Liu Feng. In reality, this was the covert transfer of the company free of charge, and it resulted in the loss of Irco (USA) Inc. assets.

2. Because the name "Irco (USA) Inc." was transferred at the same time that Irco (USA) Inc. was transferred, the assignee continued to use Irco (USA) Inc. to conduct business. In the event of improper or illegal operating activities, it would harm the reputation of Irco Group. For example, if Irco Group were to go to the United States to invest in a registered company, it would not be able to use the name "Irco (USA) Inc."

Regarding the contract signed by Liu Feng to transfer Irco (USA) Inc., Zhao Qimin of a US law firm believed it is possible to sue Liu Feng and the buyer INB Co. for the reason that "Liu Feng did not follow the spirit and intentions of the Irco (USA) Inc. 9 March 2000 board meeting resolution in signing this transfer contract", to terminate the execution of the contract.

However, if legal action is taken in the United States to file a lawsuit to resolve the Irco (USA) Inc. transfer matter, Irco Group will need to pay a considerable amount of money (USD). As stated by US lawyer Zhao Qimin,



it is very common in the United States for a lawsuit to cost US\$100,000.

The audit group held a special consultation on this issue with Mr. Shi Xiaodong, general manager of a San Francisco container services company established by China Ocean Shipping (Group) Company, and Ms. Zhou Yuzhen, chief financial officer. They believed it is very easy to register a company in the United States. Given that Irico (USA) Inc. currently has no real estate investments or credit and debt disputes in the United States and is merely a shell company, paying a large amount in attorney fees to pursue a lawsuit in the United States would have little value, and the losses would outweigh the gains.

To gain an understanding of the assignee company, the audit group made inquiries into INB Co. with several departments of the California government. INB Co. was established on 24 October 1997, with a registered address of 3695 STEVENSON BLVD BLD STE 236 FREMONT, CA 94538. Company materials reported to the state government on 12 January 1998 indicated that the only stockholder was Liu Feng, with US\$50,000 in capital stock. In materials reported on 18 March 1999, Liu Feng was the company's CEO, secretary, and chief financial officer. In materials reported on 7 May 2001, the general manager, secretary, and chief financial officer were changed to Sun Xiaolin.

According to Liu Feng: Sun Xiaolin of Hong Kong commissioned him to incorporate and hold INB Co., until 30 March 2001, when he transferred it to Sun Xiaolin's name. On April 10, he represented Irico in signing the transfer of Irico (USA) Inc. with Sun Xiaolin.

#### IV. Problems

1. Liu Feng's unauthorized transfer of Irico (USA) Inc. and refusal to provide the audit department with the required audit materials related to business activities, such as financial statements and accounting documents, made it impossible to conduct normal audit work. This is a serious violation of rules and discipline.

2. Looking at the expenditure check stubs since 1998 provided by Liu Feng, the audit group found



that the company made three payments of US\$400,000 in April 1999, for expenditures such as short-term fund investments and operational electronic products and molds for the years 1998 and 1999. Because Liu Feng did not provide the relevant financial accounts, it was not possible to check this income.

3. Without the agreement of the Group Corporation, the company's general manager, Liu Feng, made an unauthorized transfer of Irico (USA) Inc. to the United States' INB Co. on 10 April 2001, resulting in the loss of state-owned assets and in violation of provisions regarding the supervision and administration of the property of state-owned enterprises.

4. The contract transferring the company damaged the interests of Irico Group Corporation. First, the resolution of the second board of directors commissioned him to transfer the company for US\$1 million, but the contract included a condition stating that Irico Group must obtain profits of US\$700,000 annually to support it. This not only violated the intention of the board of directors' resolution, it also resulted in the loss of company assets. Second, the name "Irico (USA) Inc." was transferred at the time of the transfer, and the assignee continued to use the name Irico (USA) Inc. for operations. In the event of improper or illegal operating activities, it would harm the reputation of Irico Group.

5. In materials reported to the California government on 18 March 1999, Liu Feng was the CEO, secretary, and chief financial officer of the assignee INB Co. It was only in the company's materials reported on 7 May 2001 that the general manager, secretary, and chief financial officer were changed to Sun Xiaolin.

#### V. Recommendations

Liu Feng is clearly suspected of violations of law and discipline. However, the current evidence is insufficient. The investigation and verification of the Liu Feng matter presents two major difficulties: First, Liu Feng is in the United States and has a green card; he will not return to China. Second, the obtaining of evidence is a US legal matter, with massive and numerous obstacles and considerable costs; it will be very difficult to manage. This being a civil case, a civil lawsuit could be brought. However, Irico Group would need to pay a considerable amount of money (USD). This would have little value, and the losses would outweigh the gains.



If the Group Corporation were to undertake an administrative resolution regarding Liu Feng based on the relevant management system, such as dismissal, this could be the best outcome for Liu Feng and could be what Liu Feng is hoping for. Therefore, an administrative resolution should not be immediately undertaken when there are other possible ways to resolve the problem.

Given the aforementioned circumstances, recommendations for handling the Irico (USA) Inc. and Liu Feng issue are as follows:

1. Liu Feng's unauthorized transfer of Irico (USA) Inc. without the approval of the Group Corporation violated the wishes of the Group Corporation and seriously damaged the Group Corporation's interests. Do not acknowledge the Irico (USA) Inc. transfer contract signed by him and the United States' INB Co., and wait for an opportunity to investigate Liu Feng's legal liability.
2. Continue negotiations with Liu Feng, and call on him to immediately terminate the transfer contract signed with the United States' INB Co., execute the Irico (USA) Inc. board meeting resolution of 9 March 2000, and conduct the transfer at a price of US\$1 million.
3. The Group Corporation should undertake an administrative resolution regarding Liu Feng at the appropriate time according to the relevant management system.
4. The handling of the Irico (USA) Inc. and Liu Feng issue involves foreign and transnational matters, with strong foreign case policy implications, there are massive and numerous obstacles, and the Group Corporation is subject to the limitations of lawful duties, authority, and inspection methods. Therefore, it will be very difficult to investigate this case. We recommend referring the matter to superiors, for handling by relevant departments.

[Stamp: Irico Group Corporation, Audit Department]  
27 July 2001

CC: Supervision Department		Grade (2)
Audit Office		Printed and issued 27 July 2001
Printed by: Qing Bei	Proofreader: Zhang Xingxi	No. of copies: 4



# 彩虹集团公司 审 计 部 文 件

彩审[2001]1号

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## 关于彩虹（美国）公司审计情况汇报

彩虹集团公司：

根据集团公司领导的指示，我部组成了以部长仇兴喜为组长的三人审计小组，2001年4月27日我部以传真的方式向彩虹（美国）公司下达了审计通知。审计小组于5月27日到达美国加利福尼亚州福利蒙特市，随即展开审计工作。首先审计小组要求公司总经理刘丰提供自公司成立以来历年的会计凭证、帐簿和财务报告等实施审计所必需的资料。但刘丰总经理称，1998年以前，公司的财务是由美方股东黄雪莉控制，98年美方撤股时，未将会计资料移交我方，因而无法提供；98年以后的会计资料因公司已在2001年4月10日转让给INB公司，原公司的一切物品归受让方所有，若要求提供须经受让方同意。经过审计小组多次交涉，刘丰仅提供了以下资料：

1



由 扫描全能王 扫描创建

1. 1998年1月1日至2001年4月30日公司对外开具的支票存根;
2. 2000年1月1日至2001年4月30日的银行对帐单;
3. 彩虹(美国)公司转让合同;
4. 彩虹(美国)公司第二届董事会决议(复印件);

由于刘丰将彩虹(美国)公司已在2001年4月10日擅自转让给美国INB公司,刘丰对审计所需的与经营活动有关的财务决算报表、会计凭证等会计资料不予提供,无法满足审计最基本的条件,受法定职责、权限和检查手段的局限,无法揭示被审计的彩虹(美国)公司会计报表反映会计信息的真实情况,作出完整、正确的审计结果,使正常的审计工作无法进行。审计小组只能根据刘丰所提供的支票存根和部分银行对帐单、彩虹(美国)公司转让合同等资料对彩虹(美国)公司的一些情况进行调查了解。

在调查了解实施过程中审计小组主要对其提供的资料进行了以下工作:

1. 对其所提供1998年以来支出的支票存根进行了逐一登记;
2. 对登记的支出按支票存根所列的经济内容进行了分类;
3. 对2000年1月1日至2001年4月30日银行对帐单进行了逐一核查;
4. 对98年以来1000美元以上的公司信用卡支出进行了核查。
5. 对其所签定的公司转让合同进行了审查,并就合同内容咨询了当地的律师行。
6. 对受让方 INB 公司的基本情况以及股东、公司资信等情况





向美国政府有关部门进行了调查咨询。

### 一、公司基本情况

彩虹（美国）公司是集团公司与美方合资成立的合资公司，地址位于美国加利福尼亚州福利蒙市。公司成立于1995年7月，注册资本175万美元，其中：彩虹进出口公司投资60万美元现金，占34.3%股权；彩虹（香港）公司投资80万美元现金，占45.7%股权；黄雪莉投资12.5万美元现金，送其干股5万美元，合计17.5万美元，占10%股权；黄麦克投资17.5万美元现金，占10%股权。1995年10月彩虹集团公司派刘丰、竺简赴美。1997年3月以后竺简因签证问题在没有去美国。

据刘丰反映由于与合资外方黄氏兄妹的合作极为困难，1998年2月26日与外方达成协议，美方从公司撤股，并在1998年一年内归还我方100万美元资本金。自此，该公司转由我方独自经营，由刘丰一人负责，审计调查时得知刘丰于2000年7月20日取得美国永久居住身份（绿卡）。2001年4月10日公司被总经理刘丰擅自转让给美国INB公司。

### 二、公司财务收支情况

#### 1. 1998年以前的情况

由于刘丰未能提供1998年以前的公司会计资料，因此，无法对1998年以前的经营情况进行核实。

#### 2. 1998年以来的情况

① 据刘丰提供的支票存根资料，公司自1998年1月1日





至 2001 年 4 月 30 日累计发生费用 914,670.45 美元。

② 根据刘丰提供的公司开户银行支票存根，公司自 1998 年 1 月 1 日至 2001 年 4 月 30 日累计购置固定资产 40,417.48 美元。

③ 由于公司未提供 98、99 年度的银行对账单，其 98、99 年度的经营收入、基金投资收益和利息收入等无法核实。依据刘丰提供的公司开户银行 2000 年和 2001 年银行对账单，公司 2000 年 1 月 1 日至 2001 年 4 月 30 日累计主营业务收入 122,943.00 美元，累计主营业务成本 112,896.00 美元。

④ 依据刘丰提供的公司开户银行 2000 年和 2001 年银行对账单，公司 2000 年 1 月 1 日至 2001 年 4 月 30 日利息收入 12,105.59 美元。其中：

2000 年 10,444.06 美元

2001 年 1,661.53 美元

⑤ 依据刘丰提供的公司开户银行对账单和固定资产清单，截止 2001 年 4 月 30 日，公司净资产 119,581.42 美元。其中：

固定资产净值 30,364.17 美元

银行存款 89,217.25 美元

### 三、 合同调查情况

2001 年 4 月 10 日彩虹（美国）公司被刘丰转让给美国 INB 公司。根据刘丰所提供的转让合同书，审计小组委托中国远洋运输（集团）总公司在旧金山所设的集装箱服务有限公司总经理石小东先生，找到美国美富律师事务所对该合同进行了法律方面的



咨询。该律师事务所赵启民律师认为就合同本身来讲，合同签定的程序、依据均符合美国的法律。

综合律师的意见，审计小组认为刘丰所签订的转让合同有以下方面是违背了集团公司意愿并损害了集团公司利益的：

1、不符合彩虹（美国）公司 2000 年 3 月 9 日董事会决议精神和意愿。彩虹（美国）公司 2000 年 3 月 9 日董事会全权委托刘丰出让彩虹（美国）公司，是以 100 万美金的价格出让，且转让资金收回最迟应在 2000 年 12 月 31 日前，并没有象刘丰所签订的合同中所写的同时要彩虹集团公司每年支持其 70 万美金利润作为前提。这实际上是变相将公司无偿转让了，并造成彩虹（美国）公司资产的损失。

2、由于彩虹（美国）公司转让的同时“彩虹（美国）公司”的名称也被转让了，受让方继续使用彩虹（美国）公司来做生意，如有不正当或非法经营行为将会给彩虹集团的声誉造成一定的损害。例如彩虹集团再来美国投资注册公司将不能使用“彩虹（美国）公司”这个名称。

对于刘丰转让彩虹（美国）公司所签定的合同，美国律师事务所赵启民律师认为可按“刘丰没有按照彩虹（美国）公司 2000 年 3 月 9 日董事会决议精神和意愿签定了本转让合同”为理由起诉刘丰和买方 INB 公司，终止其合同的执行。

但如在美国通过法律诉讼打官司解决彩虹（美国）公司转让一事，彩虹集团将要支付一笔相当数额的美金，按美国律师赵启



民所说，在美国打一场官司花10万美金是一件很平常的事。

就此问题审计小组又专门与中国远洋运输（集团）总公司在旧金山所设的集装箱服务有限公司总经理石小东先生、财务总监周玉珍女士进行了交谈咨询。他们认为在美国注册公司是一件很容易的事情，如目前彩虹（美国）公司在美国没有不动产投资，没有债权债务纠纷，仅仅是一个空壳公司，在美国起诉打官司花上一大笔律师费，意义不大，得不偿失。

为了解受让方公司的情况，审计小组先后到加州政府多个部门查询 INB 公司的情况。IBN 公司成立于1997年10月24日，注册地点是 3695 STEVENSON BLVD BLD STE 236 FREMONT, CA 94538。1998年1月12日上报州政府的公司资料显示只有一名股东为刘丰，股本50,000美元。1999年3月18日上报资料中公司 CEO、秘书、财务总监均为刘丰，2001年5月7日公司上报的资料将总经理、秘书、财务总监变更为孙晓林。

据刘丰讲：INB 公司是香港人孙晓林委托他注册成立并持股，直到2001年3月30日才被其转到孙晓林名下的。4月10日他又代表彩虹与孙晓林签定了转让彩虹（美国）公司的。

#### 四、存在的问题

1、刘丰将彩虹（美国）公司擅自转让并拒绝向审计部门提供所需的与经营活动有关的财务决算报表、会计凭证等审计资料，使正常的审计工作无法进行，是严重的违规违纪行为。

2、从刘丰所提供的1998年以来支出的支票存根中审计小组发



现，公司99年4月分三次支付40万美元，用于短期基金投资和98、99年度经营电子产品、模具等业务的费用支出，因刘丰不提供有关财务帐目，所以无法对此收益情况进行核实。

3、公司总经理刘丰未经集团公司同意，于2001年4月10日擅自将彩虹（美国）公司转让给美国INB公司，造成国有资产流失，违反了国有企业财产监督管理的有关规定。

4、转让公司的合同中，损害了彩虹集团公司的利益。首先，第二届董事会决议委托其以100万美元转让，而合同中却以彩虹集团须每年支持其获得70万美元的利润为条件，不仅违背了董事会决议的原意，而且使公司资产造成损失；其次，在转让的同时“彩虹（美国）公司”的名称也被转让了，受让方继续以彩虹（美国）公司的名称经营，如有不正当或非法经营行为将会给彩虹集团的声誉造成一定的损害。

5、在1999年3月18日上报加州政府资料中受让方INB公司的CEO、秘书、财务总监均为刘丰，2001年5月7日公司上报的资料才将总经理、秘书、财务总监变更为孙晓林。

### 五、建议

刘丰涉嫌违法违纪问题明显，但目前证据不足。刘丰问题如要查证有两大难点：一是刘丰在美国，持有绿卡，不可能再回国；二是取证涉及到美国的法律问题，障碍太大太多，费用也不会少，很难做到。作为民事案子，可打民事官司，但彩虹集团将要支付一笔相当数额的美金，意义不大，得不偿失。



集团公司依据有关管理制度对刘丰其作出行政处理，如开除厂籍，这可能是刘丰最好的结局，也是刘丰所希望的。所以，在还有其他解决问题的可能情况下，不宜立即作出行政处理。

鉴于上述情况，对彩虹（美国）公司及刘丰问题的处理建议如下：

- 1、刘丰未经集团公司同意擅自转让彩虹（美国）公司，违背了集团公司意愿并严重损害了集团公司的利益，对其与美国 INB 公司所签定的彩虹（美国）公司的转让合同不予承认，等待机会，追究和保留追究对刘丰的法律责任。
- 2、继续和刘丰交涉，要求其立即终止与美国 INB 公司所签定的转让合同，执行彩虹（美国）公司 2000 年 3 月 9 日董事会决议，按 100 万美金的价格转让。
- 3、集团公司应依据有关管理制度在适当时候对其作出行政处理。
- 4、由于彩虹（美国）公司及刘丰问题的处理涉外跨国，而涉外案件政策性强，障碍太大太多，集团公司受法定职责、权限和检查手段的局限，很难查处此案，建议请示上级机关由有关部门处理。

二 00 一



抄送：监察处  
审计办公室

档（2）

2001 年 7 月 27 日印发

打印：庆蓓

校对：仇兴喜

份数：4



# **Exhibit 76**

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1995-1998	Taiwan: Taipei	X	X	X	X					X										PHS: David Chang PHS: Jerry Lin CPT: CC Liu SDI: Mr. Ha SDI: Mr. Lee LG: Pii Jae Lee	n/a	Pii Jae Lee	29 37 79-88
1995-1998	Taiwan: Taipei	X	X																	LG: PJ Lee CPT: CC Liu	n/a	Pii Jae Lee	105-107
2/14/1995			X	X	X															SDI - Hoo Mok Ha, Sung Kook Sung, Rak Jin Kim LG - Choong Bae Kim, Chang Gi Kim, Moon Bong Choi Orion - Wol Sub Kim, Sang Chul Yoon, Yong Gyu Oh	SDCRT-0086208	Dae Eui Lee	141:2-144:21
3/13/1995	Korea			X	X															SDI - Oh Sung Kwon, Dae Eui Lee Orion - Young Jae Kim, Jin Sung Kim	SDCRT-0086211	Dae Eui Lee	146:3-150:18
3/22/1995		X			X															CPT: J.S. Lu CPT: Chun-Mei Hsieh CPT: Section Chief Dong	CHU00028877-878	J.S. Lu	J.S. Lu, Dep. Vol. 2, 203-206
5/29/1995	Malaysia	X	X		X															CPT: J.S. Lu CPT: Vincent Lee LG: Mr. B.K. Jeon LG: Mr. Kim LG: Mr. Tam	CHU00028933-945	J.S. Lu	J.S. Lu, Dep. Vol. 1, 74-78 Dep. Vol. 2, 247-250 Dep. Vol. 2, 262-263
6/22/1995	Amsterdam, Netherlands									X									X	THOM: Alain Clement THOM: Wright PHS: Pelzers PHS: Jef J.H. Pos	HDP-CRT00055626		
7/17/1995		X			X															CPT: C.C. Liu CPT: Tony Chien CPT: C.Y. Lin CPT: Tony Cheng SDD: Specialist Yin SDD: Generalist Qingxing Yin Taipei President Li Department Manager Luo	CHU00028873	C.C. Liu	C.C. Liu, Dep. Vol. 1, 110-112
8/16/1995	Malaysia	X			X															CPT: J.S. Lu CPT: Christina Hsieh (Chun Mei) CPT: Vincent Lee SED: Mr. D.H. Lee SED: Mr. Moon SED: Mr. Goo SED: Mr. Kun	CHU00028869-872	J.S. Lu	J.S. Lu, Dep. Vol. 1, 78-85
9/7/1995		X							X											CPT: Michael Du CPT: C.C. Liu CPT: Tony Cheng TSB: Section Chief Kon Chun Yeu TSB: Director Yun-Peng Hong	CHU00028311-313	C.C. Liu	C.C. Liu, Dep. Vol. 1, 112-114
10/5/1995	Taiwan	X	X		X															CPT: Ching-Yuan Du CPT: Mingjing Peng LG: PJ Lee SDI: Myoung Sik Lee	CHU00028851 CHU00028856	Pii Jae Lee	206
11/13/1995	Madrid, Spain									X									X	THOM: John Neville THOM: Alain Clement PHS: Jacques Bouyer PHS: Gerard PHS: Kleisterlee PHS: Jef J.H. Pos	HDP-CRT00055593		



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/4/1995		X						X												CPT: Michael Du MIT: Assistant Vice President Chien-Jen Wang MIT: Head of Division Wen-Hsian Tseng	CHU00028558	C.C. Liu	C.C. Liu, Dep. Vol. 1, 114-115
12/5/1995		X	X																	CPT: Jason Lu CPT: Tony Du CPT: General Manager Export Dept. Mr. C.G. Kim CPT: Rep. from Singapore B.K. Jeon CPT: Rep. from K.L. Mr. Mark Tam	CHU00028930-931	C.C. Liu J.S. Lu	C.C. Liu, Dep. Vol. 1, 115-116 J.S. Lu, Dep. Vol. 2, 263-263
1/00/1996					X	X														HIT: Kobayashi SDI: Kim	HDP-CRT00025646	Nobuhiko Kobayashi	205 (Nobuhiko Kobayashi)
2/2/1996	SEDM	X			X															CPT: J.S. Lu CPT: Christina Hsieh SED: Mr. Park	CHU00028841-843	J.S. Lu	J.S. Lu, Dep. Vol. 1, 85-86 Dep. Vol. 2, 250-251
2/9/1996		X							X											CPT: President TSB: Mr. Fujiwara TSB: Mr. Sunaga TSB: Mr. Yasukawa	CHU00028302-304	C.C. Liu	C.C. Liu, Dep. Vol. 2, 334-336
4/23/1996	Malaysia	X			X		X					X								CPT: Lu (Direcor) CPT: Hsieh, Chun-Mei (Christina) MEC: Tomori, (Mr.) MEC: Vasu, (Mr.)	CHU00028524	Jason Lu	at 86-89
4/29/1996		X							X											CPT: Michael Du TSB: Mr. Fukunaga TSB: Mr. Kon Chun Yeu	CHU00028300-301	C.C. Liu	C.C. Liu, Dep. Vol. 1, 117-118
5/6/1996	Taiwan	X					X													MEC: Hsu MEC: Chang MEC: Huang CPT: Liu CPT: Cheng CPT: Du CPT: Liu (Director) CPT: Cheng (Head of Division) CPT: Du, Ching-Yuan (Michael) MEC: Hsu, Chi-Yen (Section Chief) MEC: Chang, Yu-Hau	CHU00028521	Allen Chang (Zhang) Michael Hsu	Chang at 78 Hsu at 102
5/17/1996		X	X	X	X															CPT: J.S. Lu CPT: Christina Hsieh SED: Mr. Park (Sales Senior Manager)	CHU00028809-810	J.S. Lu	J.S. Lu, Dep. Vol. 2, 222-225
5/24/1996	CPT Malaysia	X		X																CPT: J.S. Lu Orion: Mr. H.C. Moon Orion: Mr. M.J. Lee	CHU00028968-969	J.S. Lu	J.S. Lu, Dep. Vol. 2, 225-230
6/12/1996	CPT Malaysia	X	X																	CPT: J.S. Lu CPT: Christina Hsieh LG: Mr. Bak et al	CHU00028912-914	J.S. Lu	J.S. Lu, Dep. Vol. 1, 90-96 Dep. Vol. 2, 263-263
7/19/1996	TDDT	X							X											CPT: J.S. Lu CPT: Ms. Christina Hsieh TSB: Mr. Sunaga	CHU00028295-296	J.S. Lu	J.S. Lu, Dep. Vol. 1, 96-99 Dep. Vol. 2, 264-267



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/21/1996		X			X															CPT: C.C. Liu CPT: Michael Du CPT: C.Y. Lin CPT: Tony Chien SDD: Mr. D.Y. Kim SDD: Mr. Hoo Mok Ha	CHU00028803-804	C.C. Liu	C.C. Liu, Dep. Vol. 1, 120-122
9/23/1996	Hitachi Asia Taipei office	X				X														HIT: Senior Manager Chang Chien Chang CPT: Director Liu, Senior Manager Cheng, Ching-Yuan (Michael) Du	CHU00028400.01E	C.C. Liu; Kazuhiro Sakashita	276:01 (Kazuhiro Sakashita)
10/9/1996		X							X											CPT: Liu (Director); Du, Ching-Yuan (Michael) TSB: Wakayama (Department Manager); Yamamoto (Section Chief); Dasen (Assistant Vice President); Lu (Section Chief)	CHU00028291	Yasuki Yamamoto	152:2-161:25
10/17/1996			X	X	X														X	SDI- Dong Hun Lee, Dae Eui Lee, Hun Sul Chu Orion - Bok Il Jung, Sang Chul Yoon, Dae Sik Lee LG - Chang Ki Kim, Chul Ho Lee	SDCRT-0086221	Dae Eui Lee	151:8-155:13
10/24/1996	(Taiwan)	X	X																	CPT: Mr. Liu CPT: Ching-Yuan Du LG: KS Huh LG: JM Park LG: PJ Lee	CHU00028909 CHU00032068	Pil Jae Lee	111
10/30/1996	Taiwan	X					X													MEC: Hsu MEC: Chang CPT: Cheng (Edward) CPT: Du (Michael) CPT: Cheng, Ling-Yun (Edward) MEC: Hsu, Chih-Yen (Section Manager) MEC: Chang, Yu-Hao (Head of Department)	CHU0002B51 4	Michael Hsu	at 132
11/21/1996		X				X														CPT: Michael Du CPT: Tony Cheng	CHU00028398-399	S.J. Yang	S.J. Yang, Dep. Vol. 1, 69-71
11/21/1996		X				X														CPT: Michael Du CPT: Tony Cheng HIT: Taiwan Branch Senior Manager Chien-Lung Chang	CHU00028398-399	C.C. Liu	C.C. Liu, Dep. Vol. 1, 122-123
11/21/1996	HAS Taiwan	X				X														HIT: Chang Chien Chang CPT: Ching-Yuan (Michael) Du, Ling-Yun (Edward) Cheng	CHU00028398.01E	Kazuhiro Sakashita	289:23 (Kazuhiro Sakashita)
11/23/1996		X		X	X															CPT: Chairman Lin CPT: Director C.C. Liu CPT: Jason Lu CPT: President Fang SDD: CEO Sun et al Orion: CEO Yan et al	CHU00028791-793	C.C. Liu	C.C. Liu, Dep. Vol. 2, 353-362
11/23/1996		X	X	X	X	X				X										CPT: J.S. Lu CPT: President CPTM Fang CPT: C.Y. Lin CPT: C.C. Liu SDD: Mr. Sun et al Orion: Mr. Yan et al	CHU00028786-788	J.S. Lu	J.S. Lu, Dep. Vol. 1, 99-105 Dep. Vol. 2, 252-260
11/25/1996		X			X	X														HIT: Mr. Kimura, Kazuhiro Sakashita SDI: Mr. Na CPT: Director Chi-Chun (C.C.) Liu, Jason (King-Song) Lu	CHU00028784.01E	Kazuhiro Sakashita	238:10 (Kazuhiro Sakashita)
11/25/1996			X		X				X												SDCRT-0086224	Hoon Choi	98:13

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/25/1996		X			X	X		X	X											CPT: C.C. Liu CPT: Jason Lu HTC: Mr. Sakashita HTC: Mr. Kimura SDD: Mr. Na	CHU00028396-397	C.C. Liu J.S. Lu	C.C. Liu, Dep. Vol. 1, 83-86 J.S. Lu, Dep. Vol. 2, 252-260
11/26/1996		X			X	X														CPT: Jason Lu; CPT: C.C. Liu; HIT: Kazuhiro Sakashita; HIT: Mr. Kimura; SDI: Mr. Na	CHU00028396.01, CHU00028784.01		
11/26/1996					X			X													SDCRT-0086224	Hoon Choi	98:13
1997			X	X	X															SDI - Mungwoo Lee, Donghoon Lee, Changhee Jang, Dae Eui Lee LG - Mr. Kim, Moonbong Choi, Youngik Jung, Hochul Lee Orion - Bool Jung, Mr. Sangchul Yoon, Yongkyu Oh	SDCRT-0086238	Dae Eui Lee	156:1-158:7
35440	HIT Asia Plant, Taipei	X				X														CPT: Michael Du; CPT: Edward Cheng; CPT: C.C. Liu; CPT: Tony Cheng; HIT: Chiang-Lung Chang	CHU00028394		
1/15/1997		X	X																	CPT: Mr. Lin CPT: Wen-Chun Cheng LG: Kyoung Soo Hue LG: Zong Mei Lin LG: Zhen-Zi Lin LG: PJ Lee	CHU00028394	Pil Jae Lee	119
1/28/1997		X		X	X					X										CPT: C.C. Liu CPT: Michael Du CPT: C.Y. Lin CPT: Tony Cheng SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Lee PHS: President Yu Orion: Mr. Moon Orion: Mr. Hee Kil Moon	CHU00028768	C.C. Liu	C.C. Liu, Dep. Vol. 3, 515-517
2/24/1997	Taiwan: Taipei	X	X																	CPT: Mr. Liu CPT: Yu-Shuen Liu CPT: Ching-Yuan Du LG: PJ Lee	CHU00028907	Pil Jae Lee	210
2/24/1997		X			X					X										CPT: C.C. Liu CPT: Michael Du SDD: Taipei President Da-Wan Ra SDD: Manager Joon Yeul Yoon SDD: AVP Lee	CHU00032057-058	C.C. Liu	C.C. Liu, Dep. Vol. 2, 371-373

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/25/1997		X	X		X					X										CPT: C.C. Liu CPT: Michael Du CPT: President Lin CPT: Plant Manager Chen CPT: Senior Manaager Cheng SDD: Ming-Pei Song SDD: Mr. Yoon SDD: Mr. Na SDD: all together 7 members LG: Taipei President Lin PHS: Market Sales Senior Manager Tseng	CHU00028760-762	C.C. Liu	C.C. Liu, Dep. Vol. 1, 123-125
3/4/1997		X					X													MEC: Hsu MEC: Chang CPT: Cheng (Edward) CPT: Cheng (Tony) CPT: Du +V154CPT: Cheng (Senior Manager) CPT: Du, Ching-Yuan (Michael) CPT: Cheng, Ling-Yun (Edward) MEC: Xu, Zhi-Yan (Section Chief) MEC: Zhang, Yu-Hao (Director)	CHU00028507	Allen Chang (Zhang) Michael Hsu	Chang at 94 Hsu at 140
3/5/1997					X						X									PHS: Fred Hovey and Patrick Canavan. SDI: L. J. Kim, SDI: H. H. Hwang and SDI: C. M. Son.	FOX00207286	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 91:25-102:17
3/12/1997	Samsung's Taiwan office	X	X	X	X	X	X			X				X						MEC: Zhang (Chang) LG: Lee Daewoo: Moon PHS: Zeng HIT: Chang Cheng, Wen-Chun (Tony) Du HIT: Jian-Long Zhang HIT: Zhang, Jian-Long LG: Lee, Pil Jae MEC: Zhang, Yur-Hao OEC: Moon, Jong Hee PHS: Zeng, Huan-Rong SDI: Ha, Hoo Mok SDI: Lee, Myoung Sik SDI: Lee, Gae Min	CHU00028755	Allen Chang (Zhang)	Allen Chang (Zhang)at 103; Pil Jae Lee at 211
3/19/1997		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du CPT: President Lin SDD: Mr. H.S. Lee SDD: Mr. Otto Lee PHS: Mr. Milan Bala PHS: Mr. Tseng Orion: Mr. Moon LG: Mr. Ahn	CHU00028752-754	C.C. Liu	C.C. Liu, Dep. Vol. 1, 96-99
3/26/1997		X			X					X										CPT: C.C. Liu CPT: Director Yang CPT: Michael Du SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Lee PHS: Director Zeng	CHU00028746-748	C.C. Liu S.J. Yang	C.C. Liu, Dep. Vol. 1, 125-126 S.J. Yang, Dep. Vol. 1, 71-80

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/7/1997		X							X											CPT: C.C. Liu CPT: Michael Du TSB: Mr. Fu-Yong TSB: Mr. Hong TSB: Mr. Song	CHU00028283-285	C.C. Liu	C.C. Liu, Dep. Vol. 1, 126-128
4/23/1997		X	X		X		X		X	X										CPT: Yang CPT: Liu, Chih-Chun (C.C.) (Director) CPT: Yang, Sheng-Jen (S.J.) (Director) CPT: Du, Ching-Yuan (Michael) MEC: Ya, Xu-Zhu (Section Head) MEC: Koga, (Mr.)	CHU00028503	Y.J. Yang	S.J. Yang, Dep. Vol. 1, 80-83 Vol. 3, 417-420
4/23/1997		X	X	X	X	X	X			X		X								CPT: C.C. Liu CPT: Michael Du SDD: Mr. Na SDD: Mr. Ha SDD: Mr. M.S. Lee SDD: Mr. Otto Lee PHS: Mr. Song Orion: Mr. Moon	CHU00028740-743	C.C. Liu S.J. Yang	C.C. Liu, Dep. Vol. 1, 128-129 S.J. Yang, Vol. 3, 414-417
4/29/1997		X				X														CPT: C.C. Liu CPT: C.Y. Lin CPT: Edward Cheng HTC: Chien-Lung Chang	CHU00028393	C.C. Liu	C.C. Liu, Dep. Vol. 1, 129-131
4/29/1997		X					X													MEC: Hsu CPT: Cheng (Edward) CPT: Du	CHU00028505	Michael Hsu	at 147
4/29/1997		X				X														HIT: Chang Chien Chang CPT: Ching-Yuan (Michael) Du, Ling-Yun (Edward) Cheng	CHU00028393.01E	Kazuhiro Sakashita	279:12 (Kazuhiro Sakashita)
5/2/1997		X			X															CPT: Senior Manager Cheng CPT: Edward Cheng CPT: Michael Du SDI: Mingzhi Li SDI: Jiemin Li	CHU00028734-735	C.C. Liu	C.C. Liu, Dep. Vol. 1, 131-132
5/9/1997		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du SDD: D.Y. Kim SDD: Mr. Ha SDD: Mr. H.S. Lee LG: Mr. Lim Orion: Mr. Moon PHS: Mr. Zeng	CHU00028730-733	C.C. Liu	C.C. Liu, Dep. Vol. 1, 100-102
5/20/1997		X	X		X					X										CPT: C.C. Liu CPT: Michael Du SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Yeon PHS: President Song PHS: Director Tseng LG: AVP Lu	CHU00028725-727	C.C. Liu	C.C. Liu, Dep. Vol. 1, 132-133
5/20/1997		X			X				X				X							CPT: Miss Hsieh SED: Mr. Park SED: Mr. Moon SED: Mr. Joseph JQ SED: Ms. Dran	CHU00028723-724	J.S. Lu	J.S. Lu, Dep. Vol. 1, 109-113
5/23/1997		X					X		X											CPT: J.S. Lu CPT: Christina Hsieh M-MEC: Mr. Tomori	CHU00028501-502	J.S. Lu	J.S. Lu, Dep. Vol. 1, 113-117

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/27/1997			X						X											Toshiba - Wakayama Kimura SDI - Dae Eui Lee	SDCRT-0086245	Dae Eui Lee	158:21-162:16
7/8/1997		X			X															CPT: Director S.J. Yang CPT: Michael Du CPT: Ms. Hsieh SDD: Mr. Ha SDD: AVP Mr. Lee	CHU00028711-712	S.J. Yang	S.J. Yang, Dep. Vol. 1, 83-87
7/9/1997	Versailles, France									X									X	THOM: Alain Clement PHS: Jef J.H. Pos PHS: Palzers	HDP-CRT00055190		
7/16/1997		X			X				X	X										CPT: C.C. Liu CPT: S.J. Yang CPT: Michael Du TSB: Mr. Matsuda TSB: Mr. Ohmori TSB: Mr. Fukunaka	CHU00028277	C.C. Liu	C.C. Liu, Dep. Vol. 3, 514-515
7/16/1997		X			X				X											CPT: Director C.C. Liu CPT: S.J. Yang CPT: Michael Du TSB: Mr. Matsuda TSB: Mr. Ohmori TSB: Mr. Fukunaka	CHU00028277-278	S.J. Yang	S.J. Yang, Dep. Vol. 1, 87-90
7/18/1997		X			X															CPT: C.C. Liu CPT: Michael Du SDD: Taipei President Ha SDD: AVP Lee SDD: Ga Gie Lee	CHU00028707-710	C.C. Liu	C.C. Liu, Dep. Vol. 1, 134-135
8/18/1997		X			X															CPT: C.Y. Lin CPT: C.C. Liu CPT: S.J. Yang SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Lee SDD: Mr. Kim	CHU00028701-703	C.C. Liu	C.C. Liu, Dep. Vol. 1, 135-137
8/19/1997		X			X															Sang Kyu Park (SDI); J. Lu; Chistina; Soungseop Moon	SDCRT-0086247	SK Park	
9/12/1997		X					X													MEC: Hsu MEC: Chang CPT: Cheng (Edward) CPT: Du	CHU00026497	Allen Chang (Zhang) Michael Hsu	Chang at 119; Hsu at 150
9/29/1997		X							X											CPT: J.S. Lu TSB: Mr. Sunaga TSB: Mr. Nino TSB: Mr. Sato	CHU00028273-274	J.S. Lu	J.S. Lu, Dep. Vol. 1, 117-123
10/9/1997		X			X					X										CPT: Director S.J. Yang CPT: Director C.C. Liu CPT: Michael Du SDD: Mr. H.S. Lee SDD: Mr. Na SDD: Mr. Fang Ming Lee PHS: Jerry Lin	CHU00028691-693	S.J. Yang	S.J. Yang, Dep. Vol. 1, 90-98
10/20/1997		X			X															CPT: Director C.C. Liu CPT: Michael Du CPT: President C.Y. Lin CPT: Factory Manager chen CPT: Head of Division S.J. Yang SDD: CEO Shon SDD: Hong Kong Branch President Zheng SDD: Mr. D.Y. Kim SDD: Mr. Ha SDD: Mr. Lee	CHU00028689-690	C.C. Liu	C.C. Liu, Dep. Vol. 1, 137-139

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/30/1997	SDD Taipei	X			X					X										CPT: Director C.C. Liu CPT: Michael Du CPT: Director S.J. Yang SDD: Taipei President Ha SDD: AVP Lee PHS: President Song	CHU00028687-688	C.C. Liu	C.C. Liu, Dep. Vol. 1, 139-141
10/31/1997		X					X													MEC: Chang, Hsu, Bo-Chang Lee (Matsushita Taiwan - LCD); CPT: Du, Cheng (Edward), Ms. Lin	CHU00028495	Allen Chang (Zhang) Michael Hsu	Chang at 121, 129; Hsu at 153
11/7/1997	[Matsushita's Taipei office]	X					X					X								MEC: Chang, Hsu; CPT: Du, Liu, Yang CPT: Liu (Director) CPT: Yang (Director) CPT: Du, Ching-Yuan (Michael) MEC: Xu, Zhiyan (Assistant Manager) MEC: Zhang, Yu-Hao (Director)	CHU00028490-492	C.C. Liu; Allen Chang (Zhang); Hsu	Liu at 141-42; Chang at 129-30; Hsu at 156
11/21/1997		X				X														CPT: Director C.C. Liu CPT: Director S.J. Yang CPT: Michael Du SDD: Taipei President Ha PHS: Senior Manager Xiu-Li Lin LG: Mr. J.M. Park LG: VP Bi-Cai Li	CHU00028674-676	C.C. Liu	C.C. Liu, Dep. Vol. 1, 142-144
12/00/1997						X			X												HDP-CRT00025612	Nobuaki Ito Nobuhiko Kobayashi	254:12 (Nobuaki Ito); 221 (Nobuhiko Kobayashi)
12/3/1997		X	X	X	X		X		X				X							CPT: J.S. Lu CPT: Director C.C. Liu	CHU00020779-781	J.S. Lu	J.S. Lu, Dep. Vol. 1, 123-131
12/9/1997		X		X	X															CPT: C.C. Liu CPT: Michael Du CPT: S.J. Yang SDD: Mr. Ha SDD: Mr. H.S. Lee Orion: Mr. Moon	CHU00028670	C.C. Liu	C.C. Liu, Dep. Vol. 3, 517-518
12/9/1997		X		X	X															CPT: Director S.J. Yang CPT: Director C.C. Liu CPT: Michael Du SDD:Mr. Ha SDD: Mr. Lee SDD: Mr. H.S. Lee Orion Taipei: Mr. Moon	CHU00028670-671	S.J. Yang	S.J. Yang, Dep. Vol. 1, 98-103
12/16/1997	Korea		X	X	X															Orion - Bok Il Jung, Hong Kyu Oh, Dae Shik Lee Yong Il Jung, Seung Yeul Shin SDI - Dong Hoon Lee, Change Hee Change, Dae Eui Lee	SDCRT-0086248; SDCRT-0086249	Dae Eui Lee	163:1-167:15; 167:25-169:17
12/24/1997		X					X													MEC: Chang, Hsu CPT: Hsu, Chih-Yen (Assistant Manager) CPT: Chang, Yu-Hao (Head of Division) MEC:	CHU00028487	Allen Chang (Zhang) Michael Hsu	Chang II at 150; Hsu at 158
12/29/1997			X	X	X															SDI - Dae Eui Lee	SDCRT-0086253	Dae Eui Lee	170:5-175:9
1998-2001		X	X	X	X					X										Kwang Ho Lee (SDI); Song, Michael (SDI); Dae Eui Lee (SDI); Jae In Lee (SDI)	N/A	J.I. Lee	Jae In Lee Vol 1 25:24-26:2, 28:10-29:1, 29:14-30:20, 37:12-37:13, 62:5-62:9; 65:11-66:3, 66:7-66:11
1998/1999	Taiwan	X			X															J.Y. Youn		J.Y. Youn	43:01:00
1998	Cheju Island, South Korea				X				X											Toshiba: Yamamoto, Yasuki; Yoshino SDI: D.Y. Kim; another SDI employee		Yasuki Yamamoto	117:22-121:23; 137-21-141:14

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1998	Hakone, Japan				X				X											Toshiba: Yamamoto, Yasuki; Yoshino SDI: D.Y. Kim; another SDI employee		Yasuki Yamamoto	117:22-121:23; 137-21-141:14
1998	Taiwan	X	X	X	X					X										J.Y. Youn		J.Y. Youn	50:10, 51:8
1998			X			X													X		HEDUS-CRT00159915	Tom Heiser	55:19 (Tom Heiser)
1/19/1998- 1/24/1998	Taiwan																			D.Y. Kim	SDCRT-0086373		
1/15/1998		X							X											CPT: President C.Y. Lin CPT: Michael Du TSB: Mr. Hamano TSB: Mr. Oshima TSB: Mr. Yang-Chang Li	CHU00028263-264	C.C. Liu	C.C. Liu, Dep. Vol. 3, 404-411
2/20/1998		X		X																CPT: Director C.C. Liu CPT: Michael Du OEC: Taipei VP Moon	CHU00028955-957	C.C. Liu	C.C. Liu, Dep. Vol. 1, 144-145
2/24/1998		X			X															CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDD: Mr. C.W. Luo SDD: Mr. Yoon SDD: Mr. Lee	CHU00028656-657	S.J. Yang	S.J. Yang, Dep. Vol. 2, 190-192
3/3/1998	n/a					X													X	THOM: Kevin Trompack HIT: Tom Heiser	HEDUS-CRT00126627		
3/4/1998	Taiwan	X		X	X					X										CPT: S.J. Yang CPT: Michael Du CPT: C.C. Liu SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Lee SDD: Mr. H.S. Lee PHS: Mr. Jeong Lin Orion: Mr. Moon	CHU00028654-655	S.J. Yang	S.J. Yang, Dep. Vol. 1, 103-106
3/11/1998	Tokyo, Japan									X									X	THOM: Giles Taldu THOM: Christian Lissorgues PHS: Jacques Bouyer PHS: Frans A. de Bruunr PHS: Job Mensink	HDP-CRT00055091; HDP-CRT00055172		
3/12/1998	Hitachi Greenville, S.C. Factory					X													X	HIT: Tom Heiser, Thom Schmitt THOM: P. Kevin Trompak	HEDUS-CRT00126627	Tom Heiser	169:06 (Tom Heiser)
3/13/1998						X		X												MIT: Mr. Hasegawa; HIT: Mr. Oda; HIT: Mr. Komiri	HDP-CRT00025601		
3/25/1998		X	X		X				X											CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDD: Mr. Chi-Hsiao Ra SDD: Mr. Gae Min Lee	CHU00028648-650	S.J. Yang	S.J. Yang, Dep. Vol. 2, 274-278
3/30/1998	Taipei office	X	X	X	X															CPT: S.J. Yang CPT: Michael Du SDD: Mr. Na SDD: Mr. Ha SDD: Mr. Lee LG Taipei: Mr. Lim LG Taipei: Mr. Park Orion: Mr. Moon	CHU00028645-646	S.J. Yang	S.J. Yang, Dep. Vol. 1, 107-110
4/9/1998	Busan	X			X															CPT: Director C.C. Liu CPT: Michael Du SDD: President Qiwan Luo	CHU00028642-644	S.J. Yang	S.J. Yang, Dep. Vol. 1, 110-115

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/14/1998		X	X	X	X															CPT: Senior Manager S.J. Yang CPT: President C.Y. Lin CPT: Director C.C. Liu CPT: Michael Du SDD: Mr. Sun SDD: Mr. Na SDD: Mr. He SDD: Mr. Jin SDD: Mr. Li	CHU00028651-652	S.J. Yang	S.J. Yang, Dep. Vol. 1, 115-122
4/27/1998						X		X											X		HEDUS-CRT00002105	Tom Heiser	174:06 (Tom Heiser)
05/00/1998						X		X													HDP-CRT00025584	Kazumasa Hirai	130:16 (Kazumasa Hirai)
05/00/1998						X			X										X	HIT: Tom Heiser Thom Schmitt	HEDUS-CRT00002107	Tom Heiser	184:12 (Tom Heiser)
5/18/1998	Taiwan	X							X											CPT: Director C.C. Liu CPT: Manager Yang CPT: Michael Du TSB: Mr. Michihiro Yoshino TSB: Taipei Mr. Yong Fu TSB: Section Chief Yun-Peng Hong	CHU00028252-253	C.C. Liu	C.C. Liu, Dep. Vol. 1, 145-147
5/18/1998		X		X																CPT: Director C.C. Liu CPT: Senior Manager Yang CPT: Michael Du OEC: Mr. Moon OEC: Mr. Kang	CHU00028952-954	C.C. Liu	C.C. Liu, Dep. Vol. 1, 147-148
5/18/1998	Taiwan	X							X											CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du TSB: Mr. Michihiro Yoshino TSB: Mr. Fukunaka TSB: Mr. Yun-Peng Hong TSB: Mr. Yong Fu	CHU00028252-253	S.J. Yang	S.J. Yang, Dep. Vol. 3, 429-433
6/1/1998	Future meeting planned for Taiwan	X	X	X	X															CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDD: Na SDD: Ha SDD: Lee Orion: Moon Orion: Kang	CHU00026832-634	S.J. Yang	S.J. Yang, Dep. Vol. 1, 122-130
6/3/1998	EIAJ/EECA Meeting in Osaka					X	X	X	X											TSB: Wakiyama; MIT: Tsukamoto; HIT: Uchida; MEC: Shimoda	HDP-CRT00055114		
6/4/1998	Korea	X	X	X	X															CPT: S.J. Yang CPT: C.C. Liu	CHU00028638	S.J. Yang	S.J. Yang, Dep. Vol. 1, 130-134
7/8/1998	White Columns Golf Club, Alpharetta, GA					X													X	HIT: Tom Heiser THOM: Rick Love, Hans Braun	HEDUS-CRT00166576	Tom Heiser	92:03 (Tom Heiser)
7/13/1998	Third Serve Sports Grill, Norcross, GA					X				X										HIT Tom Heiser, Thom Schmitt, GL, JS PHS: Jeff Johnson, Pat Canavan,	HEDUS-CRT00166576	Tom Heiser	92:03 (Tom Heiser)
7/13/1998	Hitachi Office, Norcross, GA					X				X										HIT:Tom Heiser Thom Schmitt PHS: Geert Lievens, Pat Canavan, Jeff Johnson	PHLP-CRT-081748	Tom Heiser	100:18 (Tom Heiser)
7/15/1998	Hitachi, Norcross, GA					X				X										PH: Pat Canavan PH: Jeff Johnson HIT: Tom Heiser HIT: Thom Schmitt HIT: Geert Lievens	PHLP-CRT-081748	Jim Smith	Jim Smith Dep. Vol. 1, 249-255
7/16/1998	Matsushita					X	X													SDI: Lee (possibly)	SDCRT-0086416	Jae In Lee	Lee I at 88-94



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/18/1998					X							X								Jae In Lee (SDI)	SDCRT-0086416	J.I. Lee	
7/30/1998-8/1/1998	Taiwan																			D.Y. Kim	SDCRT-0086270		
7/31/1998		X	X	X	X					X											SDCRT-0086419		
8/00/1998		X	X	X	X					X										Kwang Ho Lee (SDI); Song, Michael (SDI); Dae Eui Lee (SDI); Jae In Lee (SDI)	N/A	J.I. Lee	Jae In Lee Vol 1 25:24-26:2, 28:10-29:1, 29:14-30:20, 37:12-37:13, 62:5-62:9; 65:11-66:3, 66:7-66:11
8/21/1998		X				X														HIT: Jian-Lung Zhang; CPT: C.C. Liu; CPT: Michael Du	HDP-CRT00055114		
8/25/1998	[Matsushita's Taipei office]	X					X					X								MEC: Chang, Hsu; CPT: Liu, Du CPT: Liu (Director) CPT: Du, Ching-Yuan (Michael) MEC: Hsu (Assistant Manager) MEC: Chang, Yu Tai (Senior Manager)	CHU00028463	Allen Chang (Zhang); Michael Hsu; C.C. Liu	Chang at 157; Hsu at 160
8/25/1998		X	X		X															CPT: J.S. Lu SED: Mr. S.K. Park SED: Mr. Y.S. Moon SED: Mr. P.K. Jeon	CHU00028613-614	J.S. Lu	J.S. Lu, Dep. Vol. 1, 131-132
8/27/1998		X				X														CPT: C.C. Liu CPT: Michael Du HTC: Manager Chien-Lung Chang	CHU00028385-387	C.C. Liu	C.C. Liu, Dep. Vol. 1, 151-153
9/00/1998	EIAJ					X	X														HDP-CRT00025568	Nobuaki Ito Nobuhiko Kobayashi	314:19 (Nobuaki Ito); 230 (Nobuhiko Kobayashi)
9/7/1998		X	X	X	X								X							SDI - Michael Son, In Kim, K.H. Lee, D.H. Lee, D.E. Lee	CHU00029316	Michael Son	124:11-133:8
9/7/1998		X	X	X	X								X							SDI - Dae Eui Lee	SDCRT-0086460	Dae Eui Lee	201:21-205:9
9/7/1998 to 9/8/1998		X	X	X	X								X							CPT: C.C. Liu CPT: Michael Du SDD: Mr. Inn Kim SDD: Mr. K.H. Lee SDD: Mr. D.H. Lee SDD: Mr. D.E. Lee SDD: Mr. Son LG: Mr. Choi LG: Mr. C.G. Kim LG: Mr. P.Y. Jeong LG: Mr. Y.I. Jeong LG: Mr. D.E. Lee Orion: Mr. H.C. Moon Orion: Mr. B.I. Jeong Orion: Mr. Karl Min Orion: Mr. H.S. Oh TCRT: Mr. Thanasak Chaiyavech	CHU00029316-320	C.C. Liu	C.C. Liu, Dep. Vol. 1, 102-104

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/9/1998		X	X	X	X								X							SDI - Dae Eui Lee	SDCRT-0086480	Dae Eui Lee	205:20-209:9
9/26/1998		X	X	X	X								X							CPT: J.S. Lu CPT: Michael Du SDD: Mr. K.H. Lee SDD: Mr. S.K. Park SDD: Mr. Moon SDD: Mr. Son LG: Mr. Cho LG: Mr. C.S. Jeon LG: Mr. Y.I. Jeong LG: Mr. K.Y. Kuo Orion: Mr. H.C. moon Orion: Mr. B.C. Jeon Orion: Mr. D.S. Lee Orion: Mr. S.K. Oh TCRT: Mr. Boonchoo	CHU00029262-264	J.S. Lu	J.S. Lu, Dep. Vol. 1, 133-137
9/26/1998	Taiwan	X	X	X	X				X				X								SDCRT-0086481	Dae Eui Lee	209:21-214:22
9/26/1998																				SDI - Michael Son	CHU00029281	Michael Son	144:12-145:2
10/9/1998	Fuzhou	X	X	X	X					X					X					CPT: J.S. Lu CPT: Dai Huang-Kuei CPT: Alex Yeh CPT: Guang-Hui Dai CPT: Wei-Lie Yu PHS: Zheng-Er Shao PHS: President Jian-Zhong Sheng PHS: Manager Bing Ma SSDD: Manager Myoung-Sik Lee SSDD: Zhen Yang Orion: Tae Sik Kong LG: J.B. Park IRI: VP Jian-She Wei	CHU00030679-683	J.S. Lu	J.S. Lu, Dep. Vol. 2, 170-176
10/9/1998		X			X					X							X			Jae In Lee (SDI)	SDCRT-008642	J.I. Lee	
10/13/1998	Ruth's Chris Scottsdale, AZ					X													X	HIT: Tom Heiser THOM: Mr. Sterling Owens	HEDUS-CRT00160563	Tom Heiser	191:05 (Tom Heiser)
10/15/1998		X					X													MEC: Chang, Hsu, Kuo-Wei Kuo: CPT: Du, Ms. Lin CPT: Du, Ching-Yuan (Michael) CPT: Hsieh, Chun-Mei (Christina) CPT: Lin., Fang-Yi SDI: Assistant Vice President SDI: Lee, Jie-Min SDI: Lee, Jia Chih	CHU00028459	Michael Hsu	Hsu II at 183
11/00/1998						X	X													HIT: Nobuaki Ito; MEC: K. Shimoda	HDP-CRT00023360	Nobuaki Ito	343:08 (Nobuaki Ito)
11/4/1998	Taiwan	X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086440	J.I. Lee	
11/16/1998	Singapore		X	X	X	X														SDI - Sang Kyu Park, Executive Vice President Kim, Senior Vice President Kim		Dae Eui Lee	215:6-220:3

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/16/1998	Singapore		X	X	X	X														SDI - Sang Kyu Park, Executive Vice President Kim, Senior Vice President Kim	SDCRT-0086482		
11/20/1998	HIT Asia Plant, Taipei	X				X														HIT: Chiang-Lung Zhang; CPT: C.C. Liu; CPT: Michael Du	CHU00028383		
11/24/1998	Korea		X	X	X															SDI - Michael Son, D.E. Lee	SDI rog responses; SDCRT-0086485	Michael Son	101:15-102:14; 151:15-163:11
11/27/1998		X	X	X	X								X							CPT: C.C.Liu CPT: Tony Chien CPT: Michael Du SDD: Mr. K. H. Lee SDD: Mr. D.E. Lee SDD: Mr. Son LG: Mr. Choi LG: Mr. Y.I. Jeong LG: Mr. K.Y. Ko Orion: Mr. H.C. Moon Orion: Mr. B.I. Jeong Orion: Mr. Karil Min Orion: Mr. H.S. Oh TCRT: Mr. Boonchoo	CHU00029259-261	C.C. Liu	C.C. Liu, Dep. Vol. 1, 149-151
11/27/1998	Korea	X	X	X	X								X							SDI - Michael Son, D.E. Lee, K.H. Lee; Orion - H.C. Moon, B.I. Chung, K.Y. Ko; CPT - C.C. Ryu; TCRT - Boonchoo	SDI rog responses; SDCRT-0086487	Michael Son	36:25 - 37:3 ; 39:17 - 42:9; 102:16-103:6; 163:21-176:23
11/27/1998	Korea	X	X	X	X								X							SDI - Kwang Ho Lee, Dae Eui Lee, Michael Sohn LG - Kyu In Choi, Yong Ik Chung, Kyu Young Ko Orion - Hee Chul Moon, Bok Il Chung, Sang Ryun Byun, Sum Kwang Oh, Dae Sik Lee Chunghwa - C.C. Ryu, Michael Du Thai CRT - Mr. Boonchoo	SDCRT-0086487 (Ex. 665)	Dae Eui Lee	221:1-227:19
12/8/1998	Beijing, China	X	X	X	X					X				X	X					CPT: J.S. Lu CPT: Tony Cheng CPT: Michael Du CPT: Alex Yeh PHS: Shou-Li Li PHS: Cheng-Er Shao PHS: Dong Liu SDD: Mr. D.Y. Kim SDD: M.S. Lee et al Orion: Mr. Moon Orion: Mr. Kong et al IRI: President Ma et al BMCC: Wen-Chiang Fan BMCC: Hsin-Wen Huang	CHU00030688-691	J.S. Lu	J.S. Lu, Dep. Vol. 1, 139-140
12/11/1998		X					X													MEC: Chang, Hsu; CPT: Du, Cheng (Tony) CPT: Cheng, Wen-Chun (Tony) (Manager) CPT: Du, Ching-Yuan (Michael) MEC: Hsu, Chih- Yen (Assistant Manager) MEC: Chang, Yu-Hao (Assistant Section Chief)	CHU00026457	Allen Chang (Zhang) Michael Hsu	Chang II at 170; Hsu II at 177
12/17/1998		X	X																	CPT: S.J. Yang LG: Mr. B.K. Jeon	CHU00028887-888	S.J. Yang	S.J. Yang, Dep. Vol. 1, 139-143

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/21/1998			X	X	X															SDI - Dae Eui Lee	SDCRT-0086473	Dae Eui Lee	228:2-229:25
1999		X				X															HEDUS-CRT00152622	Tom Heiser	435:16 (Tom Heiser)
1/00/1999					X	X															HDP-CRT00051345	Nobuhiko Kobayashi	252 (Nobuhiko Kobayashi)
1/6/1999	Rosewood Grill, Las Vegas, NV					X				X										HIT: Tom Heiser, Thom Schmitt, BK PHS: Joe Snyder, Emmanuel Corney,	HEDUS-CRT00166472	Tom Heiser	107:23 (Tom Heiser)
1/7/1999	Terrace Point, Las Vegas, NV					X				X										HIT: Tom Heiser, Thom Schmitt PHS: J. Johnson, P. Canavan	HEDUS-CRT00166472	Tom Heiser	107:23 (Tom Heiser)
1/7/1999	Terrace Point, Las Vegas, NV					X				X										HIT: Thom Schmitt, YN PHS: Pat Canavan, Jeff Johnson, Hiyoishi Kashimura	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
1/8/1999	Xiamen, China	X		X	X					X					X					CPT: J.S. Lu CPT: Guang-Hui Tai CPT: Wei-Lie Yu SDD: Ming-Zhi Li SDD: Yang Zhen PHS: Zheng-Xi Shao PHS: Bing Ma (Hua Fei Manager) Orion: Tae Sik Kong IRI: Wei-Sheng Li IRI: Jun Yao IRI: Zhao-Jie Wang	CHU00030695-697	J.S. Lu	J.S. Lu, Dep. Vol. 1, 137-138
1/12/1999	U.S.			X	X	X			X	X									X	SDI: Chul Hong Im	SDCRT-0002526		
1/13/1999	(CPT)	X	X	X	X					X										CPT: Senior Manager Cheng CPT: Miss Hsieh SDD: Mr. Ha SDD: Ms. Betty PHS: Mr. Frank Shao Orion: Mr. Moon LG: Mr. Park	CHU00030698-700	C.C. Liu	C.C. Liu, Dep. Vol. 1, 153-154
1/18/1999		X	X	X	X	X				X										CPT: C.C. Liu CPT: Miss Hsieh SDD: Mr. Inn Kim SDD: Mr. D.Y. Kim SDD: Mr. Na SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. S.Y. Choi LG: Mr. C.S. Jeon LG: Mr. K.Y. Ko LG: Mr. J.M. Park Orion: Mr. H.C. Moon Orion: Mr. K.H. Kang Orion: Mr. J.H. Moon PHS: Mr. David Chang PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu	CHU00030701-704	C.C. Liu	C.C. Liu, Dep. Vol. 1, 154-157 Dep. Vol. 3, 411-417
1/18/1999		X	X		X					X											SDCRT-0086557		
1/19/1999						X				X										HIT: Thom Schmitt, Tom Heiser, KF, SI, YN, PHS: Ben Matengee Joe Snyder	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1/22/1999		X							X											CPT: S.J. Yang TSB: Mr. Yushino TSB: Mr. Kawano TSB: Mr. Jiye TSB: Mr. Heye	CHU00028240	S.J. Yang	S.J. Yang, Dep. Vol. 1, 163-166 Dep. Vol. 3, 420-423
1/22/1999			X			X														HIT: Thom Schmitt LG: Bruce Lee, Ji Woo,	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
1/22/1999	Philips Monitor Facility, Raleigh, N.C.					X				X										HIT: Dan Mead, PHS: Paul Toma	HEDUS-CRT00158744	Tom Heiser	426:05 (Tom Heiser)
2/5/1999		X																		C.C. Liu CPT: C.Y. Lin CPT: Michael Du	CHU00021289	C.C. Liu	C.C. Liu, Dep. Vol. 1, 106-109
2/10/1999		X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086561	J.I. Lee	
2/11/1999	email				X					X	X										PIC-00007637	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 102:25-122:20
2/12/1999										X								X		Sony: Abbott Sony: Rigby Sony: Inuoe Sony: Mckie Sony: Yamano PH: J. Smith PH: S. Longley PH: S. Akass	PTC-00009040	Jim Smith	Jim Smith Dep. Vol. 1, 255-260
2/12/1999		X	X	X	X					X										CPT: Senior Manager Tony Cheng CPT: Miss Hsieh SDD: Mr. Ha SDD: Mr. J.I. Lee SDD: Ms. Betty PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu Orion: Mr. Moon Orion: Mr. Jimmy Kim LG: Mr. Park LG: Mr. I.H. Song	CHU00030713-716	C.C. Liu	C.C. Liu, Dep. Vol. 1, 157-158
3/1/1999			X			X														HIT: Thom Schmitt, RYN, TS LG: Daniel Lee, Gary Michak,	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
3/3/1999		X	X	X	X					X										CPT: C.C. Liu CPT: Miss Hsieh SDI: Mr. Youn SDI: Mr. Otto PHS: Mr. Jerry Lin PHS: Mr. Limay LG: Mr. Lu LG: Mr. Song Orion: Mr. Justin Park	CHU00030720-727	C.C. Liu	C.C. Liu, Dep. Vol. 1, 158-160

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/7/1999		X	X	X	X					X			X							CPT: C.C. Liu CPT: Michael Du SDD: Mr. K.H. Lee SDD: D.H. Lee SDD: D.E. Lee SDD: H.S. Chu SDD: S.E. Lee LG: Mr. Choi LG: Mr. P.Y. Jeong LG: Mr. K.Y. Ko Orion: Mr. H.C. Moon Orion: Mr. S.Y. Byun Orion: Mr. Karl Min Orion: Mr. H.S. Oh TCRT: Mr. Boonchoo TCRT: Mr. Wuttinun	CHU00029245-247	C.C. Liu	C.C. Liu, Dep. Vol. 1, 160-165
3/7/1999		X	X	X	X					X			X							CPT: C.C. Liu CPT: Michael Du SDD: Mr. K.H. Lee	CHU00029245-247	C.C. Liu	C.C. Liu, Dep. Vol. 1, 160-165
3/7/1999		X	X	X	X					X			X							CPT: C.C. Liu CPT: Michael Du SDD: Mr. K.H. Lee SDD: D.H. Lee SDD: D.E. Lee SDD: H.S. Chu SDD: S.E. Lee	CHU00029245-247	C.C. Liu	C.C. Liu, Dep. Vol. 1, 160-165
3/16/1999		X	X	X	X					X										CPT: Michael Du CPT: Senior Manager Cheng SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. Lim LG: Mr. Park LG: Mr. Kon Chun Yeu	CHU00030731-733	C.C. Liu	C.C. Liu, Dep. Vol. 1, 165-167
3/16/1999		X	X	X	X					X										CPT: Michael Du CPT: Senior Manager Cheng SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. Lim LG: Mr. Park LG: Mr. Kon Chun Yeu LG: Mr. Ko Orion: Mr. Moon	CHU00030731-733	C.C. Liu	C.C. Liu, Dep. Vol. 1, 165-167
3/16/1999		X	X	X	X					X										CPT: Michael Du CPT: Senior Manager Cheng SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. Lim LG: Mr. Park LG: Mr. Kon Chun Yeu LG: Mr. Ko Orion: Mr. Moon Orion: Mr. Jimmy Kim PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu	CHU00030731-733	C.C. Liu	C.C. Liu, Dep. Vol. 1, 165-167

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/16/1999		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. Lim LG: Mr. Park LG: Mr. Kon Chun Yeu LG: Mr. Ko Orion: Mr. Moon Orion: Mr. Jimmy Kim PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu	CHU00030731-733	C.C. Liu	C.C. Liu, Dep. Vol. 2, 373-377
3/20/1999		X	X	X	X		X		X				X						X		CHU00123746		
3/24/1999	Korea		X	X	X															SDI - Michael Son, J.I. Lee, J.H. Lee; Orion - K.T. Min, J.M. Kim; LG - S.H. Cho, G.Y. Ko	SDI rog responses; SDCRT-0086537	Michael Son	103:20-104:9; 176:25-179:8
3/25/1999	Paris, France				X														X	THOM: Christian Lissorgues THOM: Giles Taldu THOM: Bob Lorch THOM: P. Combes SDI: Yoon Yang SDI: Lak Jin Kim	SDCRT-0086490		
3/31/1999		X	X	X	X					X										SDI - Dae Eui Lee Chunghwa - C.C. Liu, Mr. Du Phillips - Jerry Lin	SDCRT-0086569		
4/2/1999			X			X														HIT: Yoshi, Kou; LG: Ro, Chon	HDP-CRT00025934	Nobuhiko Kobayashi	320 (Nobuhiko Kobayashi)
4/2/1999	LGE Gumi Plant		X			X														LG: Yeo; HIT: Nobuhiko Kobayashi	HDP-CRT00025934		
4/8/1999	LG Indonesia	X	X	X	X				X				X							CPT: S.J. Yang SDDM: S.K. Park LG: Mr. B.K. Jeon LG: Mr. M.J. Kim	CHU00028606-608	S.J. Yang	S.J. Yang, Dep. Vol. 1, 143-151
4/8/1999	Huntsville, Alabama		X			X														HIT: CH SB Thom Schmitt LG: Joseph Kim Joseph Woo,	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
4/10/1999		X	X	X	X					X										Jae In Lee (SDI); D.Y. Kim (SDI); C.C. Liu (CPT); Jerry Lin (Phillips)	SDCRT-0086584	J.I. Lee	
4/13/1999	Seoul	X			X															C.Y. Lin (CPT); Jae In Lee	SDCRT-0086586	J.I. Lee	
4/15/1999		X	X	X	X															CPT: C.C. Liu CPT: Michael Du SDD: Mr. Inn Kim SDD: Mr. K.H. Lee SDD: Mr. D.H. Lee SDD: Mr. Michael Son LG: Mr. Choi LG: Mr. G.I. Choi LG: Mr. C.H. Lee LG: Mr. S.H. Jo Orion: Mr. H.C. Moon Orion: Mr. S.Y. Byun Orion: Mr. Karl Min Orion: Mr. J.W. Moon	CHU00029235-237	C.C. Liu	C.C. Liu, Dep. Vol. 1, 167-168

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/15/1999		X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086593	J.I. Lee	
4/15/1999	Korea	X	X	X	X								X							SDI - Michael Son, In Kim, K.H. Lee, D.H. Lee, Mikial Sohn; Orion - H.C. Moon, I.B. Chung, J.O. Moon, S.K. Oh; LG - S.Y. Choi, I.K. Choi, S.H. Cho, C.H. Lee, CPT - C.Y. Lin, C.C. Ryu, Michael Du; TCRT - Tanasak, Boonchoo	SDI rog responses; SDCRT-0086541	Michael Son	104:11-17; 179:9-187:18
4/15/1999		X	X	X	X								X							SDI - Dae Eui Lee	SDCRT-0086545	Dae Eui Lee	233:19-236:15
4/15/1999	Brussels, Belgium				X		X			X								X	X	THOM: Serafinski SDI: Yoong Yang SDI: Hak-Jin Kim PHS: Jim Smith PHS: Jef Pos MEC: E. Nill MEC: J. Krauss DOSA: H.K. Kin DOSA: G. Nam SDI: T.S. Park SDI: Y. Yang	SDCRT-0086500		
4/21/1999	Philips Monitors Juarez					X				X										HIT: Tom Heiser, Genichi Watanabe, Akira Ookubo	HEDUS-CRT00152273	Kenichi Hazuku Tom Heiser	122:8 (Kenichi Hazuku); 327, 429 (Tom Heiser)
4/22/1999										X										PH: Pat Canavan	PTC-00007239	Jim Smith	Jim Smith Dep. Vol. 1, 269-286
4/22/1999	Cafe Lousianne, Norcross, GA					X				X										HIT: Tom Heiser TN SI PHS: Pat Canavan	HEDUS-CRT00160568	Tom Heiser	124:10 (Tom Heiser)
4/27/1999	Taiwan	X	X	X	X					X										J.Y. Youn; Senior Lim; C.C. Liu; Deputy General Park	SDCRT-0086597		
4/28/1999		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du SDD: Mr. Ha SDD: Mr. Youn SDD: Ms. Betty Lee LG: Mr. Lim LG: Mr. Song LG: Mr. Ko Orion: Mr. Moon Orion: Mr. Cho PHS: Mr. Frank Shoo PHS: Ms. Rosa Hu	CHU00030749-751	C.C. Liu	C.C. Liu, Dep. Vol. 1, 168-170
4/30/1999	Taiwan	X	X	X	X								X							J.Y. Youn		J.Y. Youn	112:25
5/11/1999		X	X	X	X															CPT: Senior Manager Yang CPT: Michael Du	CHU00029228-230	C.C. Liu	C.C. Liu, Dep. Vol. 1, 170-171
5/12/1999	Taiwan	X	X	X	X								X							J.Y. Youn		J.Y. Youn	132:10
5/12/1999	Taiwan	X	X	X	X					X										J.Y. Youn	SDCRT-0086605	J.I. Lee; J.Y. Youn	360:14 ; 453:18



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/14/1999		X	X	X	X					X										CPT: Section Chief Du CPT: Section Chief Yu CPT: Chun-Mei Hsieh SDD: Mr. D.Y. Kim SDD: Mr. Yoon PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu PHS: Mr. Frank Shao Orion: Mr. Cho LG: Mr. Lin LG: Mr. Park LG: Mr. Lu	CHU00030757-762	C.C. Liu	C.C. Liu, Dep. Vol. 1, 171-173
5/20/1999		X	X	X	X									X	X					CPT: C.C.Liu CPT: Miss Chun-Mei Hsieh SDD: Mr. I. Kim SDD: Mr. Michael Son SDD: Mr. Ha OEC: Mr. H. C. Moon	CHU00029191-194	C.C. Liu	C.C. Liu, Dep. Vol. 1, 109-110
5/21/1999		X	X	X	X					X										CPT: J.S. Lu	CHU00030766-767	J.S. Lu	J.S. Lu, Dep. Vol. 2,
6/2/1999		X	X	X	X								X							CPT: President C.Y. Lin CPT: Director C.C. Liu CPT: Michael Du OEC: Mr. Moon et al SDD: Mr. Lee et al LG: Mr. Choi et al TCRT: Mr. Chaovallit et al	CHU00029189-190	C.C. Liu	C.C. Liu, Dep. Vol. 1, 173-174
6/4/1999	mainland China (China Shenzhen)	X		X	X		X			X	X			X	X					CPT: Lu, Jing-Song (Jason) 9Senior Manager) CPT: Dai, Guang-Hui IRI: Wang, Zhao-jie MEC: Huang, Xin-wen (Senior Manager) OEC: Kong, Tae Sik (Section Chief) PHS: Shao, Zheng-xi (Senior Manager of Operations) PHS: Liu (Director) PHS: Ma, Bing SDI: Li, Ming-zhi (Department Manager) SDI: Yang, Zhen	CHU00030777	Jason lu	Lu II at 179-83
6/7/1999	Philips Singapore					X				X										HIT: Thom Schmitt, PHS: John Tan Arrisato-san Rickey Chian	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
6/8/1999	Philips Suzhou					X				X										HIT: Thom Schmitt	HEDUS-CRT00098394	Tom Heiser	110:14 (Tom Heiser)
6/15/1999	email										X								X		PTC-00007204; PTC-00007205	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 159:16-161:8; 161:15-172:21
6/17/1999	Brussels, Belgium			X	X		X			X								X	X	THOM: Serafinski SDI: Joe Colvin PHS: Jef Pos PHS: Leo Mink MEC: Krauss DW: Nam SONY: Kurebayashi	SDCRT-0086496		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/21/1999		X	X	X	X				X				X							CPT: S.J. Yang CPT: Michael Du SDI: S.K. Park SDI: S.W. Lee LG: G.I. Choi LG: S.H. Jo Orion: D.S. Lee Orion: Karl Min TCRT: Thanasakoo TCRT: Boonchoo	CHU00029185-188	S.J. Yang	S.J. Yang, Dep. Vol. 1, 152-163
6/21/1999		X	X	X	X								X							SDI- Dae Eui Lee	SDCRT-0086546	Dae Eui Lee	237:3-239:1
6/22/1999	Fuzhou	X		X											X					CPT: J.S. Lu CPT: Director C.C. Iiu Orion: Director Moon IRI: Manager Li IRI: Manager Sha	CHU00029050-051	J.S. Lu	J.S. Lu, Dep. Vol. 2, 183-190
6/23/1999	Taiwan	X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086641	J.I. Lee	
6/28/1999				X	X					X	X	X						X	X	SDD: J. Colvin, SDD: M. Son. SDD: P. Peeters, SDD: M. Schoonderwoert, SDD: R. Tabaksblat.	PHLP-CRT-080623	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 113:24-121:1
6/28/1999		X	X	X	X					X										CPT: President C.Y. Lin CPT: Manager Tony Cheng CPT: Michael Du CPT: Mx. Chun-Mei Hsieh SDD: Mr. Inn Kim SDD: Mr. D.Y. Kim SDD: Mr. J.I. Lee SDD: Mr. Ha PHS: Mr. David Chang PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu Orion: Mr. H.C. Moon Orion:Mr. K.H. Kang Orion:Mr. J.H. Moon Orion:Mr. Jimmy Kim LG: Mr. K.S. Cho LG: Mr. C.S. Jeon LG: Mr. J.M. Park LG: Mr. K.Y. Ko	CHU00030787-794	C.C. Liu	C.C. Liu, Dep. Vol. 1, 174-176
6/28/1999	Netherlands				X					X										SDI - Michael Son, Joe Colvin	PHLP-CRT080623	Michael Son	331:19-334
7/13/1999	Tianjin	X			X															CPT: J.S. Lu CPT: Wei-Lie Yu TSDD: Yu-Huan Wu TSDD: Jun Cui TSDD: Gang Li	CHU00030799-800	J.S. Lu	J.S. Lu, Dep. Vol. 1, 138-139
7/16/1999				X	X														X	THOM: Christian Lissorgues	SDCRT-0086506		
7/20/1999		X					X													MEC: Chang, Hsu, Kuo-Wei Kuo; CPT: Du, Ms. Lin	CHU00030803	Allen Chang (Zhang) Michael Hsu	Chang II at 179; Hsu II at 183

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/23/1999		X	X	X	X					X										CPT: President C.Y. Lin CPT: Manager Tony Cheng CPT: Michael Du CPT: Mx. Chun-Mei Hsieh SDD: Mr. Inn Kim SDD: Mr. D.Y. Kim SDD: Mr. J.I. Lee SDD: Mr. Ha PHS: Mr. David Chang PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu Orion: Mr. H.C. Moon Orion: Mr. K.H. Kang Orion: Mr. J.H. Moon Orion: Mr. Jimmy Kim LG: Mr. S.Y. Choi LG: Mr. C.S. Jeon LG: Mr. Johnny Song LG: Mr. K.Y. Ko	CHU00030809-814	C.C. Liu	C.C. Liu, Dep. Vol. 1, 176-177
7/28/1999		X	X		X					X										CPT: C.C. Liu CPT: Ms. Fang-Yi Lin CPT: Michael Du SDD: Mr. Youn SDD: Mr. Otto Lee LG: Mr. Lin LG: Mr. Xong PHS: Mr. Milan PHS: Ms. Rosa Hu	CHU00030807-808	C.C. Liu	C.C. Liu, Dep. Vol. 1, 177-179
7/28/1999	Taiwan	X	X	X	X					X										C.C. Liu; Senior Lim; Deputy General Manager Moon; J.Y. Youn	SDCRT-0086662	J.Y. Youn	141:5; 458:7
8/00/1999		X	X	X	X					X										CPT: C.C. Liu CPT: C.Y. Lin OEC: Young Nam Kim OEC: Hee Chul Moon SDI: In Kim SDI: Duk Yun Kim LG: Ki Song Cho LG: Sang Ryong Choi PH: President David PH: Jerry Lin PH: Kyung Ho Kang PH: Jae Ho Bae PH: Jung Sik Lim PH: Seung Pyung Koo PH: Yong Ro Song PH: Han Ku Cho	SDCRT-0086675	Jim Smith	Jim Smith Dep. Vol. 1, 192-198
8/3/1999	Japan: Kanagawa					X	X													HIT: Junji Kaneko; MEC: Takadera	HDP-CRT00025918		
8/4/1999	Taiwan	X	X	X	X					X										J.Y. Youn		J.Y. Youn	145:7

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/5/1999	Nanjing, China	X		X	X					X				X	X					CPT: J.S. Lu CPT: Yu Wei-Lieh CPT: C.C. Liu SDD: Myoung Sik Lee SDD: Zhen Yang BMCC: Xin-Wen Huang Orion: Jung Saeng Park IRI: Wei-Sheng Li IRI: Zhao-Jie Wang PHS: Zheng-Xi Shao PHS: Xiu-Hua Li PHS: Si-Quan Li PHS: Dong Liu	CHU00030819-822	J.S. Lu	J.S. Lu, Dep. Vol. 2, 157-158
8/9/1999		X			X															PH: David Chang SDI: D.Y. Kim	SDCRT-0086690	Jim Smith	Jim Smith Dep. Vol. 1, 44-61
8/16/1999			X		X															Hwa Gyu Lee (LG); Chang Seon Choi (LG); Seung Hwa Baek (LG); Woon Gyu Lee (LG); Young Sup Moon (SDI); Jung Hoon Choi (SDI); Hun Sul Chu (SDI)	SDCRT-0086772	HS Chu	
8/20/1999		X	X	X	X					X										CPT: Lin (President) CPT: Liu (Director) CPT: Du, Ching-Yuan (Michael) LG: Cho, S.Y. LG: Jeon, C.S. LG: Ko, K.Y. OEC: Moon, H.C. OEC: Cho, Han-Koo OEC: Kang, K.H. OEC: Kim PHS: Chang, David PHS: Smith, J.M. PHS: Lin, Jerry PHS: Pei, J.H. SDI: Kim, In SDI: Kim, D.Y. SDI: Ha SDI: Lee, Jae In	CHU00030835 & CHU00030835.01E	Jim Smith	Jim Smith Dep. Vol. 1, 61-79
8/20/1999		X																		CPT: President Lin CPT: C.C. Liu CPT: Michael Du SDD: Mr. In Kim SDD: Mr. D.Y. Kim SDD: Mr. Ha SDD: Mr. Lee Jae In LG: Mr. S.Y. Cho LG: Mr. C.S. Jeon LG: Mr. K.Y. Ko Orion: Mr. H.C. Moon Orion: Mr. Han-Koo cho Orion: Mr. K.H. Kang Orion: Mr. Kim PHS: Mr. David Chang PHS: Mr. J.M. Smith PHS: Mr. Jerry Lin PHS: Mr. J.H. Pei	CHU00030835-838	C.C. Liu	C.C. Liu, Dep. Vol. 1, 179-180

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/23/1999	Future meeting planned for Taiwan and Malaysia	X	X	X	X					X			X	X	X	X				CPT: S.J. Yang CPT: Michael Du CPT: Tony Cheng SDI: Mr. In Kim SDI: D.E. Lee SDI: Y.S. Moon SDI: Michael Son LG: S.Y. Choi LG: G.I. Choi LG: Hwa-Kyu Lee LG: C.S. Choi LG: K.J. Park Orion: Mr. H.C. Moon Orion: Mr. H.K. Cho Orion: Mr. Karl Min TCRT: Mr. Thanasakoo TCRT: Mr. Boonchoo	CHU00029179-184	S.J. Yang	S.J. Yang, Dep. Vol. 1, 166-172
8/23/1999	Taiwan				X															SDI - Michael Son, In Kim	CHU00029179	Michael Son	337:21-339:22
8/26/1999		X	X	X	X															CPT: Michael Du CPT: Chu Xiangguo (TOK) LG: Mr. Mok-Hyeon Seong SDD: Mr. Kim Young Gon Orion: Mr. Sung-Bae Kim	CHU00030839-840	C.C. Liu	C.C. Liu, Dep. Vol. 3, 401-404
8/27/1999		X	X	X	X								X							CPT: Michael Du CPT: Senior Manager Cheng CPT: Senior Manager Yang SDD: Mr. Inn Kim SDD: Mr. D.E. Lee SDD: Mr. Y.S. Moon SDD: Mr. Michael Son LG: Mr. S.Y. Choi LG: Mr. G.I. Choi LG: Mr. Hwa-Kyu Lee LG: Mr. C.S. Choi LG: Mr. K.J. Park Orion: Mr. H.C. Moon Orion: Mr. H.K. Cho Orion: Mr. Karl Min TCRT: Mr. Thanasa TCRT: Mr. Boonchoo	CHU00029179-184	C.C. Liu	C.C. Liu, Dep. Vol. 1, 180-182
09/00/1999					X	X				X											HDP-CRT00025915	Kazumasa Hirai Nobuhiko Kobayashi	283:23 (Kazumasa Hirai); 260, 471 (Nobuhiko Kobayashi)
9/2/1999		X	X	X	X					X										CPT: Director C.C. Liu CPT: Ms. Hsieh CPT: Senior Manager Cheng SDD: Mr. Youn PHS: Mr. Jerry Lin Orion: Mr. Moon LG: Mr. Lin LG: Mr. Song	CHU00030846-850	C.C. Liu	C.C. Liu, Dep. Vol. 1, 182-183
9/2/1999		X	X	X	X					X										J.Y. Youn		J.Y. Youn	152:8

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/7/1999		X					X													CPT: Yang, Sheng-Jen (S.J.) MEC: Tomori, (Mr.) (Sales Manager)	CHU00028438	S.J. Yang: Y.J Yang	Yang at 172-73
9/13/1999		X	X	X	X								X							CPT: C.C. Liu CPT: S.J. Yang SDD: Mr. Park et al LG: Mr. Jeon et al Orlon: Mr. Kim et al TCRT: Mr. Boonchoo	CHU00029065-067	S.J. Yang	S.J. Yang, Dep. Vol. 2, 192-198
9/14/1999		X					X													MEC: Chang, Hsu, Kuo CPT: Liu (Sales Director) CPT: Yang, Sheng-Jen (S.J.) MEC: Songben (Department Manager)	CHU00028439	Allen Chang (Zhang): Y.J Yang	Chang II at 183; Yang at 192-203
9/14/1999	M-MEC Malaysia factory	X					X													CPT: S.J. Yang CPT: Director Liu M-MEC: Mr. Matsumoto M-MEC: Mr. Songben	CHU00028441-446	S.J. Yang	S.J. Yang, Dep. Vol. 2, 198-203
9/20/1999		X	X	X	X					X			X							CPT: Liu, Chih-Chun (C.C.) (Director) CPT: Cheng, Wen-Chun (Tony) (Senior Manager) CPT: Yang, Sheng-Jen (S.J.) (Senior Manager) CPT: Du, Ching-Yuan (Michael) SDI: Kim, Inn (In) SDI: Kim, D.Y. SDI: Lee, Jae In SDI: Ha LG: Choi, S.Y. LG: C.S. Jeon LG: Lim LG: Ko, K.Y. OEC: Cho, H.K. OEC: Moon OEC: Kang, K.H. OEC: Kim, Jimmy PHS: Smith, Jim PHS: Jerry Lin PHS: Hu, Rosa	CHU00030855 & CHU00030855.01E	Jim Smith	Jim Smith Dep. Vol. 1, 79-98
9/20/1999		X	X	X	X					X										CPT: Liu, Chih-Chun (C.C.) (Director) CPT: Chen (Manager) CPT: Yang, Sheng-Jen (S.J.) (Senior Manager) CPT: Du, Ching-Yuan (Michael) SDI: Kim, Inn (In) SDI: Son, Michael SDI: Ha LG: Choi, S.Y. LG: Choi, G.I. LG: Lee, Hwa-Kyu LG: Ko, K.Y. LG: Park, K.J. OEC: Cho, H.K. OEC: Moon, J.H. OEC: Min, Karl PHS: Mink, Leo PHS: Hu, Rosa	CHU00029175 & CHU00029175.01E	Jim Smith	Jim Smith Dep. Vol. 1, 98-106

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/20/1999		X	X	X	X					X										CPT: C.C. Liu CPT: C.Y. Lin CPT: Tony Cheng CPT: S.J. Yang CPT: Michael Du SDD: Mr In Kim SDD: Mr D.Y. Kim SDD: Mr. Lee Jae In SDD: Mr. Ha LG: Mr. S.Y Choi LG: Mr. C.S. Jeon LG: Mr. K.Y. Ko LG: Mr. Lim Orion: Mr. Han-Koo Cho Orion: Mr. K.B. Kang Orion: Mr. Jimmy Kim Orion: Mr. Moon PHS: Mr. Jim Smith PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu	CHU00030855-868	C.C. Liu	C.C. Liu, Dep. Vol. 1, 183-185
9/20/1999	Taipei		X	X	X					X													109:6
9/20/1999	Taiwan	X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086700	J.I. Lee	
9/21/1999		X		X	X					X				X						CPT: C.C. Liu CPT: Michael Du CPT: Senior Manager Tony Cheng CPT: S.J. Yang SDD: Mr Inn Kim SDD: Mr. Michael Son SDD: Mr. Ha LG: S.Y Choi LG: G.I. Choi LG: Mr. Hwa-Kyu Lee, LG: Mr. K.Y. Ko, LG: Mr. KJ. Park Orion: Mr H.K. Cho Orion: Mr. J.H. Moon Orion: Mr. Karl Min PHS: Mr. Leo Mink PHS: Ms. Rosa Hu	CHU00029175-178	C.C. Liu	C.C. Liu, Dep. Vol. 1, 185-187 Dep. Vol. 3, 421-424 Dep. Vol. 3, 539-541
9/23/1999					X		X			X								X	X	PHS: Jef Pos PHS: Leo Mink SDI: Colvin THOM: P. Serafinski THOM: M. Kris MEC: J. Krauss SONY: M. Kurebayashi OEC: Heechul Moon OEC: Gil Nam	SDCRT-0086508		
9/27/1999	Taiwan	X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086700	J.I. Lee	
9/28/1999	Email				X	X														HIT: Koyabashi, Hirai, Ito	HDP-CRT00025915	Nobuhiko Kobayashi	260 (Nobuhiko Kobayashi)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/29/1999	Toshiba Thailand	X							X			X								S.J. Yang, C.C. Liu; Toshiba-Mr. Kanno, Mr. Kawashima, Mr. Nishimura, Mr. Yuasa	CHU00028228	S.J. Yang; Kazutaka Nishimura	
Late 1999					X		X														SDCRT-0087291	HS Chu	
10/00/1999					X	X															HDP-CRT00023305	Nobuhiko Kobayashi	285 (Nobuhiko Kobayashi)
10/1/1999		X					X													MEC: Chang, Yi-Feng Huang	CHU00028432	Allen Chang (Zhang)	Chang II at 185
10/4/1999	Taiwan	X			X															J.Y. Youn		J.Y. Youn	260:25
10/11/1999		X			X															SDI- Dae Eui Lee Chunghwa - S.J. Yang	SDCRT-0086553	Dae Eui Lee	239:12-241:17
10/13/1999		X	X	X	X															CPT: President Lin CPT: Director C.C. Liu CPT: Section Chief Du CPT: Ms. Hsieh SDD: Mr. Lee PHS: Mr. Jerry Lin PHS: Ms. Limay Liu Orion: Mr. Moon LG: Mr. Lin LG: Mr. Charles Lu	CHU00030888-893	C.C. Liu	C.C. Liu, Dep. Vol. 1, 187-188
10/15/1999	Fax	X	X	X	X					X										CPT: Michael Du CPT: C.Y. Lin CPT: C.C. Liu CPT: Tony Cheng SDI: H. M. Ha SDI: In Kim SDI: D.Y. Kim SDI: J. I. Lee SDI: H.M. Ha LG: J. S. Rim LG: S.Y. Choi LG:K.Y. Ko LG: C.S. Jeon OEC: J.H. Moon OEC: H. K. Cho OEC: H.S. Lee OEC: K. H. Kang OEC: Jimmy Kim PH: Jim Smith PH: Jerry Lin PH: Limay Liu	CHU00021272	Jim Smith	Jim Smith Dep. Vol. 1, 234-249
10/20/1999		X	X						X											CPT: S.J. Yang TSB: Mr. Yasukawa	CHU00028229-330	S.J. Yang	S.J. Yang, Dep. Vol. 2, 208-216
10/26/1999	Taiwan	X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086703	J.I. Lee	



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/27/1999		X	X	X	X								X							CPT: C.C. Liu CPT: Michael Du CPT: Senior Manager Yang SDD: Mr. Inn Kim, SDD: Mr. S.K Park SDD: Mr. Y.S. Moon LG: Mr. S. Y Choi, LG: Mr. G.I. Choi, LG: Mr. Hwa-Kyu Lee, LG: Mr. H.W. Jeon, LG: Mr. E.J. Kim Orion: Mr. H.K. Cho, Orion: Mr. J.H. Moon, Orion: Mr. Karl Min TCRT: Mr. Chovali TCRT: Mr. Thanasa TCRT: Mr. Boonchoo	CHU00030899-903	C.C. Liu	C.C. Liu, Dep. Vol. 1, 188-189 Dep. Vol. 2, 362-370
10/29/1999	Paris, France				X														X	THOM: Christian Lissorgues SDI: Y. Yang SDI: L.J. Kim	SDCRT-0086511		
10/29/1999				X	X		X			X								X	X	PHL: J. Pos PHL: L. Mink PHL: G. Staal SDI: Ma. Matthes SDI: Lak Jin Kim SDI: Colvin MEC: J. Krauss SONY: Kurebayashi OEC: G. Nam THOM: Serafinski THOM: K. Mortier	SDCRT-0086514		
11/3/1999		X																		CPT: C.C. Liu CPT: Senior Manager Cheng CPT: Michael Du SDD: Mr. Youn LG: Mr. Lim LG: Mr. Lu PHS: Mr. Jerry Lin PHS: Mr. Milan Balan PHS: Ms. Limay Liu	CHU00030904-909	C.C. Liu	C.C. Liu, Dep. Vol. 1, 189-191
11/3/1999		X	X		X					X										J.Y. Youn		J.Y. Youn	269:13
11/9/1999	SDD Korea	X	X	X	X					X										CPT: S.J. Yang SDD: Mr. Y.S. Moon SDD: Mr. Michael Son SDD: Mr. T.R. Park LG: Mr. Choi Orion: Mr. Oh Orion: Mr. Karl Min	CHU00029059-061	S.J. Yang	S.J. Yang, Dep. Vol. 2, 216-223
11/9/1999						X			X											HIT: Saito; TSB: Amano	MTPD-0016566		
11/9/1999	Taiwan	X	X	X	X					X										J.Y. Youn; Mr. Ha		J.Y. Youn	158:3; 320:13
11/14/1999		X	X			X	X													CPT: C.C. Liu CPT: S. J. Yang M-MEC: Department Manager Songhen	CHU00028441	C.C. Liu	C.C. Liu, Dep. Vol. 3, 518-519

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/25/1999		X	X	X	X					X			X							CPT: Liu (Director) CPT: Cheng (Manager) CPT: Yang (Manager) CPT: Du (Section Chief) CPT: Hsieh, Chun-Mei (Christina) LG: Choi, S.Y. LG: Choi, G.I. LG: Park, K.J. LG: Ko, K.Y. OEC: Cho, H.K. OEC: Kang OEC: Min, Karl PHS: Smith, Jim PHS: Hu, Rosa SDI: Song, Michael SDI: Park, J.Y. T-CRT: Chaovalit T-CRT: Boonchoo	CHU00029163 & CHU00029163.01E	Jim Smith	Jim Smith Dep. Vol. 1, 106-114
11/25/1999		X	X	X	X					X					X	X				CPT: Director C.C. Liu CPT: Manager Yang CPT: Section Chief Du CPT: Ms. Hsieh SDD: Mr. Michael Song SDD: Mr. J.Y. Park PHS: Mr. Jim Smith PHS: Ms. Rosa Hu LG: Mr. S.Y. Choi LG: Mr. G.I. Choi LG: Mr. K.J. Park LG: Mr. K.Y. Ko Orion: Mr. H.K. Cho Orion: Mr. Kang Orion: Mr. Karl Min TCRT: Mr. Chaovalit TCRT: Mr. Boonchoo	CHU00029163-170	C.C. Liu	C.C. Liu, Dep. Vol. 1, 191-192 Dep. Vol. 2, 382-384 Dep. Vol. 3. 424-433
11/26/1999	Brussels, Belgium			X	X		X			X									X	Phillips: Pos Mink, Staal; Thomson: Mortier: Samsung: Colvin, Samsung: Matthes, Samsung: Lak Jin Kim; Europe Matsushita Electronics Co. J. Krauss; Orion: G. Nam	Samsung 2nd Supplemental Response p 35	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
11/26/1999		X	X	X	X		X													Jae In Lee (SDI)	SDCRT-0086722	J.I. Lee	
11/26/1999	Taiwan				X															SDI - Michael Son	SDCRT-0086889		
12/9/1999				X	X		X			X								X	X	OEC: Moon MEC: Nill MEC: Krauss THOM: Lissorgues SDI: Park SDI: Yang SONY: Sekiya PHS: Smith PHS: Pos	SDCRT-0086233		
12/10/1999	Malaysia				X															SDI - Michael Son	SDCRT-0086893		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/13/1999		X					X													MEC: Chang; CPT: Du, Ching-Yuan (Michael) CPT: Lin, Fang-Yi MEC: Chang, Yu-Hao	CHU00028434	Allen Chang (Zhang)	Chang II at 189
12/16/1999	Hitachi's Greenville plant					X				X										HIT: Fukuzawa, Saito, Toyama, PHS: Schaffer, Gotje	JLJ-00001286	Noboru Toyama	115 (Noboru Toyama)
12/17/1999		X	X	X	X	X	X			X										Jae In Lee (SDI)	SDCRT-0086722	J.I. Lee	
12/22/1999							X			X										MEC: Nishiyama PHS: Canavan	MTPD-0212628	Nishiyama	
12/22/1999		X	X	X	X					X										J.Y. Youn		J.Y. Youn	162:22
12/31/1999		X		X	X				X	X						X				CPT: C.C. Liu CPT: S. J. Yang TSB: Mr. Yasukawa	CHU00029039-041	C.C. Liu	C.C. Liu, Dep. Vol. 2, 332-334 Dep. Vol. 3, 433-436
2000						X				X											HEDUS-CRT00026591	Kazumasa Hirai	253:7 (Kazumasa Hirai)
2000					X	X				X											HDP-CRT00044868	Kenichi Hazuku	149:1, 168 (Kenichi Hazuku)
2000					X	X			X												HDP-CRT00052500	Kenichi Hazuku	138:1 (Kenichi Hazuku)
2000/2001		X	X		X															LG: Mr. Han LG: Sang Jong Han Other unnamed competitors	n/a	Duk Chul Ryu	113 119 170-173
2000-2001	n/a			X	X														X	THOM: James Hanrahan	TDA00705		
1/1/2000	Philips' Ottawa plant					X				X										HIT: Toyama, Enomoto	JLJ-00002601	Noboru Toyama	155 (Noboru Toyama)
1/3/2000						X														HIT: Saito; TSB: Amano	MTPD-0016566		
1/18/2000		X	X	X	X					X			X							CPT: S.J. Yang SDD: Mr. Park SDD: Mr. Yang SDD: Mr. Michael Son LG: Mr. Choi LG: Mr. Ko et al Orion: Mr. Won Orion: Mr. Oh Orion: Mr. Karl Min TCRT: Mr. Boonchoo TCRT: Mr. Naratip PHS: Ms. Rosa Hu	CHU00029155-162	S.J. Yang	S.J. Yang, Dep. Vol. 2, 223-228

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1/24/2000		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du CPT: President Lin CPT: Senior Manager Cheng LG: Choi, S.Y. LG: Lee, S.K. LG: Ko, K.Y. LG: Lim OEC: Cho, Han-Koo OEC: Lee, H.S. OEC: Moon, J.H. OEC: Oh, S.G. PHS: Smith, Jim PHS: Lin, Jerry PHS: Liu, Limay SDI: Kim, In SDI: Kim, D.Y.	CHU00030960 & CHU00030960.01E	Jim Smith; Duk Chul Ryu; C.C. Liu	Jim Smith Dep. Vol. 1, 126-135; DC Ryu 200; C.C. Liu, Dep. Vol. 1, 194-195
1/24/2000		X	X	X	X					X			X							CPT: Liu (Director) CPT: Yang (Senior Manager) CPT: Michael Du LG: Choi, S.Y. LG: Choi, G.I. LG: Lee, Hwa-Kyu LG: Ko, K.Y. LG: Son, Jonny OEC: Cho, H.K. OEC: Min, Karl PHS: Smith Jim PHS: Hu, Rosa SDI: Kim, Inn SDI: Son, Michael SDI: Ha T-CRT: Thanasa T-CRT: Boonchoo	CHU00029152 & CHU00029152E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 114-125; C.C. Liu, Dep. Vol. 1, 192-193
1/24/2000		X	X	X	X	X	X													Jae In Lee (SDI)	SDCRT-0086733	J.I. Lee	
1/24/2000	Taiwan				X															SDI - Michael Son, In Kim, Mr. Ha	SDCRT-0087008; CHU00029152	Michael Son	321:4-323:10
1/25/2000- 1/28/2000																					SDCRT-0087015	Hoon Choi	111:03:00
1/26/2000		X	X	X	X					X										Jae In Lee (SDI)	SDCRT-0086733	J.I. Lee	
1/29/2000	Mitsubishi Mexico					X		X		X									X	HIT: Ryuichi Ueda, MIT: Sales Department General Manager	HDP-CRT00025965	Kazumasa Hirai	116:21 (Kazumasa Hirai)
2/2/2000				X	X					X									X	PHS: Leo Mink THOM: Christian Lissorgues DOSA: Hee Chul Moon DOSA: Gil Name SDI: Lak Jin Kim	SDCRT-0087301		
2/22/2000	HIT Asia Plant, Taipei	X				X														CPT: Michael Du; CPT: C.C. Liu; HIT: Chiang-Lung Chang	CHU00028382		
2/23/2000	Japan: Fujisawa					X	X													HIT: Junki Kaneko	HDP-CRT00025970		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/23/2000					X					X											SDCRT-0087405	J.I. Lee	
2/25/2000	N/A	X			X		X			X									X	Phillips: J. Pos, Phillips: L. Mink, G. Staal; EMEC: J. Krauss; Dosa: G. Nam; Chunghwa: D. Ross; Thomson: A. Martin, Thomson: K. Mortier; Samsung: L.J. Kim	Samsung 2nd Supplemental Response p 37	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
3/00/2000		X	X		X	X		X												HIT: Watanabe LG, CPT, SDI, MIT: Unspecified employees	HDP-CRT00025985	Nobuhiko Kobayashi	268 (Nobuhiko Kobayashi)
3/00/2000					X	X															HDP-CRT00051348	Nobuhiko Kobayashi	289 (Nobuhiko Kobayashi)
3/2/2000						X			X											HIT: Saito; TSB: Amano	MTPD-0016566		
3/3/2000					X				X											KC Oh (SDI); Wakiyama (Toshiba)	SDCRT-0005813	KC Oh	
3/6/2000	Indonesia	X							X											CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du TSB: Mr. Kazuteru Yasukawa	CHU00028224-225	S.J. Yang	S.J. Yang, Dep. Vol. 2, 228-231
3/6/2000 to 3/10/2000	Indonesia, Thailand	X		X	X				X											CPT: Director C.C. Liu CPT: Manager Yang CPT: Michael Du TSB: Mr. Katzuteru Yasukawa	CHU00028215-216	C.C. Liu	C.C. Liu, Dep. Vol. 2, 330-332
3/7/2000- 3/8/2000		X	X	X	X					X			X							CPT: Liu (Director) CPT: Yang (Manager) CPT: Du, Ching-Yuan (Michael) LG: Choi, S.Y. LG: Choi, G.I. LG: Jeon, B.K. LG: Ko, K.Y. LG: Park, K.J. OEC: Cho, H.K. OEC: Lee, H.S. OEC: Jeon, B.C. OEC: Min, Karl PHS: Smith, Jim PHS: Knippenberg, Janvan SDI: Lee, D.E. SDI: Park, S.K. SDI: Song, Y.K. SDI: Lee, S.W. T-CRT: Chaovalit T-CRT: Boonchoo	CHU00030979 & CHU00030979E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 135-145; C.C. Liu, Dep. Vol. 1, 195-200
3/19/2000	Phillips	X	X	X	X					X											SDCRT-0087408	J.I. Lee	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/24/2000		X	X	X	X					X			X							CPT: Michael Du CPT: S.J. Yang SDD: Mr. Park SDD: Mr. Ahn SDD: Mr. Son SDD: Mr. Lee LG: Mr. Choi LG: Mr. Park Orion: Mr. Lee Orion: Mr. Jeon Orion: Mr. Min TCRT: Mr. Boonchoo PHS: Rosa Hu	CHU00029144-146	S.J. Yang	S.J. Yang, Dep. Vol. 2, 231-238
3/28/2000					X							X								Matsushita - Shimizu Matsumoto SDI - Dae Eui Lee, Sr. Vice President Kim,, Dir. Lee, General Mgr. Park, G.M. Song, Manager Cho.	SDCRT-0087314	Dae Eui Lee	242:22-245:15
3/29/2000		X			X															SDI - Dae Eui Lee, President Kim Chunghwa - President Hwang	SDCRT-0087316	Dae Eui Lee	246:1-249:3
3/30/2000	Japan					X														HIT: Genichi Watanabe (meets with competitor who he won't name in email)	HDP-CRT00025985		
3/31/2000		X	X	X	X					X										CPT: J.S. Lu CPT: Hsieh Chun-Mei	CHU00030985-990	J.S. Lu	J.S. Lu, Dep. Vol. 2, 190-196
4/00/2000						X	X													HIT: Yuuichi Kumazawa	HDP-CRT00049231	Nobuaki Ito Yuuichi Kumazawa	445:08 (Nobuaki Ito); 128 (Yuuichi Kumazawa)
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea				X				X											TSB: Fujita, Norio SDI: Lee, Justin		Norio Fujita	
4/00/2000-6/00/2003	Korea		X						X											TSB: Fujita, Norio LG: Chung, A. H.		Norio Fujita	
4/00/2000-6/00/2003	Korea		X						X											TSB: Fujita, Norio LG: Chung, A. H.		Norio Fujita	
4/00/2000-6/00/2003	Korea		X						X											TSB: Fujita, Norio LG: Chung, A. H.		Norio Fujita	
4/00/2000-6/00/2003	Korea		X						X											TSB: Fujita, Norio LG: Chung, A. H.		Norio Fujita	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/00/2000-6/00/2003	Korea		X						X											TSB: Fujita, Norio LG: Chung, A. H.		Norio Fujita	
4/00/2000-6/00/2003	Korea			X					X											TSB: Fujita, Norio Orion: Cho		Norio Fujita	
4/00/2000-6/00/2003	Korea			X					X											TSB: Fujita, Norio Orion: Cho		Norio Fujita	
4/00/2000-6/00/2003	Korea			X					X											TSB: Fujita, Norio Orion: Cho		Norio Fujita	
4/6/2000	Xiamen, China	X	X	X	X					X				X	X					CPT: J.S. Lu CPT: Wei-Lie Yu SDD: Myong Sik Lee SDD: Zhen Yang SDD: Xiao-Mei Yu IRI: Zhao-Jie Wong BMCC: Xin-Wen Huang LG: Zong-Wen Park PHS: Zheng-Fu Tian PHS: Dong Liu Orion: Myong Doek Pak	CHU00030992-994	J.S. Lu	J.S. Lu, Dep. Vol. 2, 158-160
4/6/2000						X	X													HIT: Yuici Kuamazawa	HDP-CRT00049232		
4/11/2000	HIT Asia Plant, Taipei	X				X														CPT: Michael Du; CPT: C.C. Liu; HIT: Chiang-Lung Chang	CHU00028380		
4/11/2000						X	X													HIT: Yuici Kuamazawa	HDP-CRT00049231		
4/12/2000		X			X															CPT: J.S. Lu CPT: Jiang Xuexing	CHU00030998	J.S. Lu	J.S. Lu, Dep. Vol. 2, 197-203
4/14/2000						X			X											HIT: Saito; TSB: Amano	MTPD-0016566		
4/14/2000		X	X	X	X					X										CPT: C.C. Liu CPT: Michael Du CPT: Manager Yang SDD: Mr. K.H. Lee SDD: Mr. S.K. Park SDD: Mr. Michael Son SDD: Mr. S.W. Lee LG: Mr. S.Y. Choi LG: Mr. G.I. Choi LG: Mr. D.Y. Ko LG: Mr. K.J. Park Orion: Mr. H.K. Choo Orion: Mr. Y.J. Kim Orion: Mr. Karl Min PHS: Mr. Jim Smith PHS: Mr. Jerry Lim PHS: Mr. Ney PHS: M. Corsino	CHU00030995-997	C.C. Liu	C.C. Liu, Dep. Vol. 2, 218-219
4/13/2000			X						X											LG: A.H. Chung Toshiba: Norio Fujita	TSB-CRT-00042493	Kazuhiro Nishimaru; Norio Fujita	Nishimaru: 255:24-265:2

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/14/2000		X	X	X	X					X										LG: Choi, S.Y. LG: Choi, G.I. LG: Ko, D.Y. LG: Park, K.J. OEC: Choa, H.K. OEC: Kim, Y.J. OEC: Min, Karl PHS: Smith, Jim PHS: Lim, Jerry PHS: Ney PHS: Corsino, M. SDI: Lee, K.H. SDI: Park, S.K. SDI: Son, Michael SDI: Lee, S.W.	CHU00030995 & CHU00030995.01E	Jim Smith	Jim Smith Dep. Vol. 1, 286-295; 335-340
4/19/2000	LG Office	X	X	X	X					X											SDCRT-0087411	J.I. Lee	
4/21/2000						X														HIT: Genichi Watanabe (meets with Korean CRT competitor who we won't name)	HDP-CRT00043292		
5/2/2000		X					X													MEC: Chang	CHU00025427	Allen Chang (Zhang)	Chang II at 194
5/15/2000			X						X											TSB: Yamamoto, Yasuki LG: Hoshinori, Kane; Noh	TSB-CRT-00041620	Shinichiro Tsuruta; Norio Fujita	Tsuruta: 139:12-149:7
5/17/2000	N/A - Fax		X	X	X						X										FOX00207394	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 213:16-221:22
5/25/2000	China: Shanghai	X	X	X	X					X					X	X				CPT: Liu (Director) CPT: Michael Du LG: Choi, S.Y. LG: Choi, G.I. LG: Ko, D.Y. LG: Park, K.J. OEC: Cho, H.K. OEC: Lee, H.S. OEC: Min, Karl PHS: Smith, Jim PHS: Qiang, Jin PHS: Lim, Jerry SDI: Kim, Inn SDI: Lee, K.H. SDI: Park, S.K.	CHU00029131 & CHU00029131.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 145-148; 283-286; C.C. Liu, Dep. Vol. 2, 219-220



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/25/2000		X	X	X	X					X			X							CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du SDD: Mr. Inn Kim SDD: Mr. K.H. Lee SDD: Mr. S.K. Park SDD: Mr. Michael Son LG: Mr. S.Y. Choi LG: Mr. G.I. Choi LG: Mr. D.Y. Ko LG: Mr. K.J. Park Orion: Mr. H.K. Cho Orion: Mr. H.S. Lee Orion: Mr. Karl Min PHS: Mr. Jim Smith PHS: Mr. Jin Qiang PHS: Mr. Jerry Lim	CHU00029135-137	S.J. Yang	S.J. Yang, Dep. Vol. 3, 392-409
5/26/2000		X	X	X	X					X										CPT: Liu (Director) CPT: Lu, Jing-Song (Jason) (Manager) CPT: Yang (Manager) CPT: Du, Ching-Yuan (Michael) LG: Choi, S.Y. LG: Lee, S.K. LG: Ko, K.Y. LG: Lim OEC: Cho, Han-Koo OEC: Moon, J.H. PHS: Smith, Jim PHS: Lin, Jerry SDI: Kim, In SDI: Kim, D.Y. SDI: Lee, Jae In	CHU00031006 & CHU00031006.01E	Jim Smith; J.S. Lu	Jim Smith Dep. Vol. 1, 148-158; J.S. Lu, Dep. Vol. 2, 160-162
5/26/2000	N/A			X	X		X												X	EMEC: J. Krauss; Phillips: J. Pos, Phillips: L. Mink, Phillips: G. Staal; Thomson: K. Mortier; SDI: L.J. Kim, SDI: M.A. Matthes; Orion: G. Nam r	Samsung 2nd Supplemental Response p 39	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
5/26/2000	China				X															SDI - Michael Son	SDCRT-0087069; CHU00029131	Michael Son	215:16-217:3
5/31/2000	Nanjing	X								X										CPT: J.S. Lu CPT: Director C.C. Liu PHS: VP Yao Zong PHS: VP Jin PHS: Xiu-Hua Li PHS: Dong Liu	CHU00031015-016	J.S. Lu	J.S. Lu, Dep. Vol. 2, 162-163
6/8/2000	Taiwan, Taipei	X					X													MEC: Hsu (Vice Manager) MEC: Chang, Yu-Hao (Director) CPT: Cheng (Sr. Manager) CPT: Du, Ching-Yuan (Michael)	CHU00028425	Allen Chang (Zhang) Michael Hsu	Chang II at 200; Hsu II 187
6/9/2000	Taiwan	X							X											CPT: Liu, C.C.; Cheng, Tony; Du, Michael Toshiba: Suzuki, Satoshi; Fukunaga, Seeichi; Yun-Peng, Hong	TSB-CRT-00039414	Yasuki Yamamoto; Norio Fujita	Yamamoto: 316:3-325:10; 338:2-354:2

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/9/2000		X							X											CPT: C.C. Liu CPT: Manager Cheng CPT: Michael Du TSB: Mr. Fukunaka TSB: Mr. Suzuki TSB: Mr. Yun-Peng Hong	CHU00028209-210	C.C. Liu	C.C. Liu, Dep. Vol. 2, 220-222
6/16/2000		X				X														CPT: C.C. Liu CPT: Michael Du CPT: Manager Cheng TSB: Manager Chien-Lung Chang	CHU00031028-030	C.C. Liu	C.C. Liu, Dep. Vol. 2, 222-223
6/20/2000	Malaysia: The Mines Resort & Golf Club	X	X	X	X					X			X						X	CPT: Liu (Director) CPT: Yang (Senior Manager) CPT: Du, Ching-Yuan (Michael) LG: Choi, S.Y. LG: Park, K.J. OEC: Cho, H.S. OEC: Lee, H.S. OEC: Min, Karl PHS: Smith, Jim PHS: Lim, Jerry SDI: Kim, Inn SDI: Lee, K.H. SDI: Park, S.K. SDI: Son, Michael T-CRT: Thanasak T-CRT: Sirichai	CHU00021262 & CHU00021262.01E; CHU00029116 & CHU00029116.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 158-181; C.C. Liu, Dep. Vol. 2, 223-227
6/20/2000	Malaysia	X	X	X	X					X										CPT: President Lin CPT: C.C. Liu CPT: Michael Du CPT: Senior Manager Yang SDI: Mr. S.T. Kim SDI: Mr. Inn Kim SDI: Mr. Lee Jae In SDI: Mr. D.Y. Kim LG: Mr. K.S. Cho LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. K.Y. Ko LG: Mr. Lim Orion: Mr. H.K. Cho Orion: Mr. Y.N. Kim Orion: Mr. J.H. Moon Orion: Mr. Jimmy Kim PHS: Mr. Jim Smith PHS: Mr. Jerry Lin	CHU00031010-012	C.C. Liu; Duk Chul Ryu	C.C. Liu, Dep. Vol. 2, 227-229; DC Ryu 209

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/20/2000		X	X	X	X		X			X		X								CPT: S.J. Yang CPT: C.Y. Lin CPT: C.C. Liu CPT: Michael Du SDI: Mr. S.T. Kim SDI: Mr. In Kim SDI: Mr. D.Y. Kim SDI: Mr. Lee Jae In LG: Mr. K.S. Cho LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. K.Y. Ko LG: Mr. Lim OEC: Mr. Y.N. Kim OEC: Mr. Han-Koo Cho OEC: Mr. J.H. Moon OEC: Mr. Jimmy Kim PHS: Mr. Jim Smith PHS: Mr. Jerry Lin	CHU0003101-012	S.J. Yang	S.J. Yang, Dep. Vol. 3, 423-429
6/20/2000	Shenzhen	X	X	X	X					X										CPT: J.S. Lu CPT: Michael Du SDI: Mr. S.T. kim SDI: Mr. In Kim SDI: Mr. D.Y. Kim SDI: Mr. Lee Jae In LG: Mr. K.S. Cho LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. K.Y. ko LG: Mr. Lim OEC: Mr. Y.N. Kim OEC: Mr. Han-Koo Cho OEC: Mr. J.H. Moon OEC: Mr. Jimmy Kim PHS: Mr. Jim Smith PHS: Mr. Jerry Lin	CHU00031010-012	J.S. Lu	J.S. Lu, Dep. Vol. 2, 163-165
6/20/2000	Malaysia				X															SDI - Michael Son, In Kim, S.K. Park, K.H. Lee	SDI rog responses; SDCRT-0087103; CHU00021262; CHU00029116		
6/21/2000	M-MEC Malaysia	X				X	X													CPT: Yang CPT: Liu (Director) CPT: Yang: (Manager) CPT: Du, Ching-Yuan (Michael) MEC: Shimizu (Managing Director) MEC: Matsumoto, Mitsuhiro (Gen Mgr)	CHU00028424	Y.J. Yang	S.J. Yang, Dep. Vol. 2, 238-244 Dep. Vol. 3, 368-379
6/21/2000	Japan					X				X										HIT: Genichi Watanabe; PHS: Nico Veenstra; PHS:Jasper Staaden; PHS:Reinoud Selbeck; PHS:Rober Lu	HDP-CRT00052474		
6/23/2000-6/25/2000		X								X					X					CPT: Cheng, Wen-Chun (Tony) IRI: Tao, Sa (SaTao) (Sales President) PHS: Smith, Jim PHS: Mink, Leo	CHU00029110.01E	Jim Smith	Jim Smith Dep. Vol. 1, 290-295
6/27/2000		X		X	X						X										SDCRT-0087417	J.I. Lee	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/28/2000		X	X	X	X					X										CPT: Cheng (Director) CPT: C. Y. (Michael) Du SDI: Ha SDI: Anita Tsai LG: Lim LG: Lu OEC: Kang PH: Jerry Lin PH: Milan Baran PH: Limay Liu	CHU00031013 & CHU00031013.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 181-184; C.C. Liu, Dep. Vol. 2, 229-230
7/3/2000					X	X														HIT: Nobuaki Ito SDI: General Manager Lee	HDP-CRT00019426	Nobuaki Ito	123:04 (Nobuaki Ito)
7/3/2000					X	X														HIT: Kobayashi, SDI: Kim	HDP-CRT00051354	Nobuhiko Kobayashi	277 (Nobuhiko Kobayashi)
7/4/2000						X				X											HAS-CRT00066386	Kawashima	76-98, 82-84 (Kawashima)
7/13/2000		X	X	X	X					X										CPT: S.J. Yang CPT: Michael Du CPT: C.C. Liu SDI: Mr. Kim SDI: Mr. Lee SDI: Mr. Park SDI: Mr. Son LG: Mr. Choi LG: Mr. Park Orion: Mr. Cho Orion: Mr. Kim Orion: Mr. Min PHS: Mr. Lim PHS: Mr. Park	CHU00029108-109	S.J. Yang	S.J. Yang, Dep. Vol. 2, 244-249
7/18/2000		X				X														CPT: Fang-Yi Lin CPT: Michael Du HTC: Assistant Manager Chien-Lung Chang	CHU00028376	C.C. Liu	C.C. Liu, Dep. Vol. 2, 230-232
7/18/2000	HIT Asia Plant, Taipei	X				X														CPT: Michael Du; CPT: C.C. Liu; CPT: Tony Cheng; CPT: Fang-Yi Ling; HIT: Chiang-Lung Chang	CHU00028376		
7/26/2000	Shanghai	X			X						X										SDCRT-90322	J.I. Lee	
7/28/2000	U.S.				X					X									X	SDI: C.H. Im SDI: Yoon Yang PHS: Cor Saris PHS: Jeff Johnson	SDCRT-0002506		
8/7/2000						X	X														HDP-CRT00023416	Nobuaki Ito Yuuichi Kumazawa	58:5 (Nobuaki Ito); 132 (Yuuichi Kumazawa)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/7/2000	Email		X			X														HIT: Kaneko, Kawamu; LG: Choi	HDP-CRT00026001	Noboru Toyama	231 (Noboru Toyama)
8/9/2000					X	X														HIT: Yuichi Kumazawa (codes for other competitors (Toshiba or Thomson; and Matsushita or Mitsubishi)	HDP-CRT00023414		
8/10/2000						X	X		X	X								X		HIT: Nobuaki Ito. SONY: Shogo Urata MEC: K. Shimoda PHS: Mr. POS TSB: Keisuke Wakiyama	HDP-CRT00022897	Nobuaki Ito	405:05 (Nobuaki Ito)
8/21-8/26/2000	Taiwan	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0087107	SK Park	
8/22/2000		X	X	X	X					X										CPT: Liu (Vice President) CPT: Yang (Director) CPT: Ching-Yu Michael Du LG: Choi, S.Y. LG: Choi, G.I. LG: Son, Johnny OEC: Cho, H.K. OEC: Lee OEC: Min, Karl OEC: Kang PHS: Smith, Jim PHS: Lim, Jerry PHS: Hu, Rosa (Ms.) SDI: Kim, Inn SDI: Park, S.K. SDI: Son, Michael SDI: Ha	CHU00029105 & CHU00029105.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 184-192; C.C. Liu, Dep. Vol. 2, 232-233
8/24/2000	Beijing, China	X	X		X	X				X				X					X	BMCC: Shing Chung Yang BMCC: Moon Gang Beom SEG/HIT: Sung Jeon Son SEG/HIT: Kuk Kyun Yang LG: Ah Pyung Yang CPT: Chun Kyu Ha CPT: Wie Hun Oh Caihong: Geon Chung Ma Caihong: Geon Seol Wei PHS: Cheol Ahn Kye Sanghai Yongxing: Ok Mae Hu THOM: Geg Wang SDI: Kwan Tae Choi SDI: Lim Bong Wang	SDCRT-0087334		
8/28/2000	Japan				X	X														SDI - Michael Son	SDCRT-0087112		
8/29/2000	Nihon Building				X	X														SDI: Director Lee	HDP-CRT00023416	Nobuaki Ito Yuuichi Kumazawa	58:5 (Nobuaki Ito); 132 (Yuuichi Kumazawa)
8/30/2000					X		X													Jae In Lee (SDI); Alex Kinoshita (MEC)	SDCRT-0087381	J.I. Lee	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/21/2000		X	X	X	X					X										CPT: V.P. Liu CPT: Director Cheng CPT: Director Yang CPT: Director Ching-Yuan Du SDI: In Kim SDI: D.Y. Kim SDI: Lee, Jae In SDI: Ha LG: S.Y. Choi LG: S.K. Lee LG: Lim LG: K.Y. Ko OEC: Cho OEC: J.H. Moon OEC: Jimmy Kim OEC: Kang PH: Jerry Lin	CHU00031051 & CHU00031051.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 198-200; C.C. Liu, Dep. Vol. 2, 320-323
9/21/2000		X	X	X	X					X										CPT: VP Liu CPT: Director Cheng CPT: Director Yang CPT: Ching-Yuan (Michael) Du SDI: In Kim SDI: D.E. Lee SDI: S. K. Park SDI: Michael Son LG: S.Y. Choi LG:K.J. Park LG: K.Y. Ko OEC: Cho OEC: Lee OEC: Karl Min OEC: Kang PH: Jim Smith PH: Jerry Lin PH: Rosa Hu	CHU00031056.01E	Jim Smith	Jim Smith Dep. Vol. 1, 295-302
9/21/2000		X																		CPT: S.J. Yang CPT: Tony Cheng SDI: Mr. In Kim SDI: Mr. D.Y. Kim SDI: Mr. Lee Jae In SDI: Mr. Ha LG: Mr. S.Y. Choi LG: Mr. J.H. Moon LG: Mr. Lim LG: Mr. K.Y. Ko Orion: Mr. Cho Orion: Mr. J.H. Moon Orion: Mr. Kim Orion: Mr. Kang PHS: Mr. Jerry Lin	CHU00030151-155	S.J. Yang	S.J. Yang, Dep. Vol. 2, 249-251 Dep. Vol. 3, 423-423
9/29/2000	U.S.				X					X									X	SDI: Chul Hong Im SDI: Woongrae Kim PHS: Cor Saris	SDCRT-0002488		
10/00/2000	CEA Convention					X													X	HIT: Tom Heiser Thom Schmitt, THOM: Alex Hepburn	HEDUS-CRT00161617	Tom Heiser	408:20 (Tom Heiser)
10/3/2000		X							X											Toshiba: Seeichi Fukunaga	TSB-CRT-00039829	Norio Fujita	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/6/2000					X	X														HIT: Kumazawa, Ito, Kubo	HTP-CRT00023427	Yuuichi Kumazawa	141:9-25,142:8-13 (Yuuichi Kumazawa)
10/15/2000		X		X	X						X										SDCRT-0087427	J.I. Lee	
10/18/2000						X	X				X			X	X			X			HDP-CRT00042019	Kazumasa Hirai	327:6 (Kazumasa Hirai)
10/22/2000	Irico Displays Group Corporation Cathode ray tube Plant					X									X						HDP-CRT00042019	Kazumasa Hirai	327:6 (Kazumasa Hirai)
10/24/2000					X				X												TSB-CRT-00041721	Yasuki Yamamoto	203:13-209:12
10/25/2000			X						X											Toshiba: Norio Fujita LG: Chun	TSB-CRT-00042610	Norio Fujita	
10/25/2000		X	X	X	X					X			X							CPT: Liu (Vice President) CPT: Yang (Director) CPT: Michael Du LG: Choi, S.Y. LG: Choi, G.I. LG: Park, K.J. OEC: Cho OEC: Kim OEC: Min, Karl OEC: Lee PHS: Smith, Jim PHS: Hu, Rosa SDI: Kim, In SDI: Park, S.K. SDI: Son, Michael T-CRT: Thanasa T-CRT: Sirichai	CHU00031075 & CHU00031075.01E; CHU00028975 & CHU00028975.01E	Jim Smith; C.C. Liu	Jim Smith Dep. Vol. 1, 200-203; Jim Smith Dep. Vol. 1, 203-205; C.C. Liu, Dep. Vol. 2, 233-236
11/00/2000						X	X	X	X									X			HDP-CRT00004416	Nobuaki Ito	346:14 (Nobuaki Ito)
11/1/2000						X													X	HIT: Tom Heiser THOM: Alex Hepburn	HEDUS-CRT00161617	Tom Heiser	408:20 (Tom Heiser)
11/3/2000		X				X														CPT: VP C.C. Liu CPT: Michael Du HTC: AVP Chien-Lung Chang	CHU00028374-375	C.C. Liu	C.C. Liu, Dep. Vol. 2, 236-237
3/19/2001		X	X	X	X					X										CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director Yang CPT: Fang-Yi Lin SDD: Mr. D.Y. Kim SDD: Mr. Ha SDD: Mr. J.I. Lee LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. J.K. Han LG: Mr. K.Y. Ko Orion: Mr. Cho Orion: Mr. J.H. Moon Orion: Mr. Jimmy Kim Orion: Mr. Kang PHS: Mr. Jim Smith PHS: Mr. Jerry Lin PHS: Mr. Milan Baran	CHU00031111-112	C.C. Liu	C.C. Liu, Dep. Vol. 2, 237-239

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/8/2000	Philips offices conference room					X				X										HIT: Wata, Ooku, Chen, Chang, Kuma, Ooyama, PHS: Wente, Selbeck, Lu, Huang, Lee	HDP-CRT00007139	Nobuhiko Kobayashi	427 (Nobuhiko Kobayashi)
11/8/2000						X													X	HIT: Tom Heiser, Thom Schmitt, Kazumasa Hirai, Ryoji Hirai, THOM: Alex Hepburn	HEDUS-CRT00164814	Tom Heiser	193:23 (Tom Heiser)
11/8/2000	U.S.					X													X	HIT: Thom Schmitt HIT: Tom Heiser THOM: Alex Hepburn	HEDUS-CRT00164814; HEDUS-CRT00164816	Lloyd Heiser	193
11/27/2000			X			X				X	X									HIT: Dan Mead PHS: Luke Chiang	HEDUS-CRT00183630	Tom Heiser	126:22 (Tom Heiser)
11/27/2000-12/01/2000	Malaysia	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0087178	SK Park	
11/29/2000					X							X								SDI - Jae In Lee, Mr. Park, Ki Young Chung, Dae Eui Lee Matsushita - B. Tomori, K. Matsumoto	SDCRT-0087331	Dae Eui Lee	251:1-253:7
12/14/2000	Japan					X				X										HIT: Taku Yamanaka PHS: George Chou PHS: Hardy Lin	HDP-CRT00052436		
12/7/2000	U.S.					X													X	HIT: Thom Schmitt HIT: Tom Heiser THOM: Alex Hepburn	HEDUS-CRT00168774	Thomas Schmitt	274:18 (Thom Schmitt)
12/13/2000					X	X														HIT: Ooku, Ueda, Kumazawa SDI: Seung Cheol Kim, Sun, Korasaki	HTP-CRT00023426-23427	Yuuichi Kumazawa Nobuhiko Kobayashi	146:17-25,147:6-25, 148:9-23 (Yuuichi Kumazawa) 474 (Nobuhiko Kobayashi)
12/22/2000	China	X	X		X					X				X					X	MII: Won Bang Lim MII: Geon Chung Hwang BMCC: Dae Lim Lee SEC: Kuk Kyun Yang LG Changsha: Ah Pyung Yang Guangdong CPT: Chung Hae Ryu Caihong: Hyo Rim Shin PHS: Ho Joo Sanghai Yongxing: Moon Eui Bun THOM: Geg Wang THOM: Ji Up Hwang SDI: Kwan Tae Choi SDI: Lim Bong Wang	SDCRT-0087336		
2001	Bangkok								X		X									Toshiba: Nishimaru, Kazuhiro		Kazuhiro Nishimaru	115:23-121:21
2001						X	X			X	X										HEDUS-CRT00005869	Tom Heiser	354:09 (Tom Heiser)
2001					X	X															HDP-CRT00005044	Kenichi Hazuku	165:2 (Kenichi Hazuku)
2001					X	X			X	X								X	X		HDP-CRT00027193	Kazumasa Hirai Nobuhiko Kobayashi Noboru Toyama	69 (Kazumasa Hirai); 332, 478 (Nobuhiko Kobayashi); Noboru Toyama (69)
2001		X		X	X	X	X	X	X	X	X							X			HDP-CRT00027174	Kazumasa Hirai	214:4 (Kazumasa Hirai)
Early 2001	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama SDI: Lee; Lee LG: Fairly high ranking employee		Yasuki Yamamoto	117:22-121:23; 122:12 134:8
Early 2001-1/2003	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:17 137:3
Early 2001-1/2004	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:17 137:3



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
Early 2001-1/2005	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:17-137:3
Early 2001-1/2006	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:17-137:3
Early 2001-1/2007	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:17-137:3
1/9/2001						X													X	HIT: Thom Schmitt, Tom Heiser, THOM: Alex Hepburn	HEDUS-CRT00187137	Tom Heiser	409:17 (Tom Heiser)
1/10/2001	Toshiba Booth					X			X											HIT: Thom Schmitt, BK, TSB: Scott Ramirez	HEDUS-CRT00187137	Tom Heiser	409:17 (Tom Heiser)
1/11/2001		X	X	X	X	X			X	X			X								HAS-CRT00065403	Kenichi Hazuku	210:18 (Kenichi Hazuku)
1/15/2001					X				X												TSB-CRT-00041746	Yasuki Yamamoto	209:15-221:10
1/26/2001	England		X		X					X								X	X	PHS: Leo Mink THOM: Christian Lissorgues SDI: Lockjin Kim DOSA: Kyounghoon Choi	SDCRT-0087662		
1/30/2001	Sony's Osaka Office					X												X		HIT: Junji Kaneko SONY: Ikeda SONY: Tsukii	HDP-CRT00026045		
1/30/2001	Taiwan	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0087464	SK Park	
02/00/2001					X	X	X													HIT: Nobuaki Ito	HDP-CRT00049280	Nobuaki Ito Yuuichi Kumazawa	83:24, 325 (Nobuaki Ito); 175 (Yuuichi Kumazawa)
02/00/2001						X													X		HDP-CRT00049270	Nobuaki Ito Noboru Toyama	277:5, 349 (Nobuaki Ito); 195 (Noboru Toyama)
2/15/2001	Nihon Building, Tokyo, Japan		X			X														HIT: Maruyama HIT: Watanabe HIT: Sakamoto LG: Kim Sung-Bun	HDP-CRT00026050, HDP-CRT00027948		
2/15/2001			X		X															LG: In Kim LG: Pyung Goo Jeon LG: Mr. Ryu SDI: Mr. Lee	SDCRT0087679	Duk Chul Ryu	125
2/20/2001	n/a					X													X	HIT: Kazumasa Hirai HIT: Thom Schmitt HIT: Tom Heiser HIT: Ryoji Hirai HIT: Yosuke Nakanishi HIT: Tetsuo Asano HIT: Keith Brown HIT: Ed Paige HIT: Patrick Watson HIT: Kawamura Katsuyuki HIT: Nobuhiko Kobayashi HIT: Kiyoshi Kubo	HEDUS-CRT00188826		
2/21/2001						X				X											HEDUS-CRT00004617	Tom Heiser	457:04 (Tom Heiser)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/23/2001						X	X													HIT: Nobuaki Ito	HDP-CRT00049280		
2/23/2001	Matsushita in Fujisawa, Kanagawa, Japan					X	X													HIT: Kiyoshi Kubo MEC: Takadera	HDP-CRT00049226		
2/26/2001					X	X														HIT: Yuuichi Kumazawa	HDP-CRT00056186	Nobuaki Ito Yuuichi Kumazawa	129,398 (Nobuaki Ito); 282, 424 (Yuuichi Kumazawa)
03/00/2001		X		X	X	X	X	X	X	X	X		X					X	X		HDP-CRT00023625	Nobuaki Ito	360:01 (Nobuaki Ito)
3/00/2001						X				X	X							X	X		HEDUS-CRT00188863	Tom Heiser Thom Schmitt Noboru Toyama	219:7, 405 (Tom Heiser); 201 (Thom Schmitt); 222 (Noboru Toyama)
3/3/2001	SDI San Diego				X		X													Jae In Lee (SDI); Moon Il Bae (SDI); CH Lim (SDI); K.C. Oh (SDI); Woong Rae K Kim (SDI); Alex Kinoshita (MEC)	SDCRT-0002585	J.I. Lee	
3/7/2001						X				X											HEDUS-CRT00004710	Tom Heiser Kazumasa Hirai	133:3 (Tom Heiser); 263, 423 (Kazumasa Hirai)
3/8/2001	email										X									PDC: J. Killen, LPD: P. Canavan Okuda, Hongoh, Ino	PTC-00006569	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 205:10-213:4
3/10/2001	SDI San Diego				X						X									Jae In Lee (SDI); Moon Il Bae (SDI); CH Lim (SDI); K.C. Oh (SDI); Kyu In Choi (LPD)	SDCRT-0002588	J.I. Lee	
3/13/2001	Email				X					X											PHLP-CRT-030092	Kris Mortier	Kris Mortier Dep.Vol. 2, 402-410
3/14/2001	Singapore					X														HIT: Mike Chen Teco: Martni Hsei	HAS-CRT00078245		
3/16/2001				X	X	X			X											HIT: Nobuaki Ito	HDP-CRT00049348	Nobuaki Ito Yuuichi Kumazawa	372:22 (Nobuaki Ito)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/16/2001						X	X	X	X									X		HIT: Nobuaki Ito, Sony: Mayumi Kuroyanagi, Takayoshi Kitawaki, Yoichi Tamamura, Masayuki Watanabe MEC: K. Shimoda, Mitsubishi: Norikazu Nakanishi TSB: Keisuke Wakiyama	HDP-CRT00022911	Nobuaki Ito	353:10 (Nobuaki Ito)
3/19/2001		X	X	X	X					X										CPT: Mr. Liu CPT: Mr. Cheng LG: S.Y. Choi LG: S.K. Lee LG: J.K. Han LG: K.Y. Ko OEC: Mr. Cho OEC: JH Moon OEC: Jimmy Kim OEC: Mr. Kang PHS: Jerry Lin PHS: Jim Smith PHS: Milan Baran SDI: DY Kim SDI: Mr. Ha SDI: J.I. Lee	CHU00031111	Duk Chul Ryu	213
3/19/2001		X	X	X	X					X			X							CPT: Liu (Vice President) CPT: Cheng (Director) LG: Choi, S.Y. LG: Lee, S.K. LG: Han, J.K. LG: Ko, K.Y. OEC: Cho OEC: Moon, J.H. OEC: Kim, Jimmy OEC: Kang PHS: Lin, Jerry PHS: Smith, Jim PHS: Baran, Milan SDI: Kim, D.Y. SDI: Ha SDI: Lee, J.I.	CHU00031111 & CHU00031111.01E	Jim Smith	Jim Smith Dep. Vol. 1, 205-208
3/20/2001		X	X	X	X				X				X		X					CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director S.J. Yang SDI: Mr. S.K. Park SDI: Mr. J.Y. Yuan LG: Mr. S.Y. Choi LG: Mr. G.I. Choi LG: Mr. K.J. Park Orion: Mr. S.H. Cho Orion: Mr. Kung Orion: Mr. Y.J. Kim Orion: Mr. Choe PHS: Mr. Jerry Lin PHS: Ms. Rosa Hu	CHU00031113-114	C.C. Liu	C.C. Liu, Dep. Vol. 2, 239-240 Dep. Vol. 3, 418-421 Dep. Vol. 3, 541-544
3/19/2001-3/20/2001	Taiwan	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0087467	SK Park	
3/20/2001	Detroit, Michigan					X				X										HIT: Tom Heiser TS PHS: Pat Canavan Jeff Johnson Daren Ivy	HEDUS-CRT00004705	Thom Schmitt	257:05 (Thom Schmitt)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/22/2001			X								X										PTC-00002381	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 34:7-49:13
3/22/2001	email										X								X		PHLP-CRT-089918	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 123:7-136:4
3/22/2001						X															HDP-CRT00005257	Nobuaki Ito Nobuhiko Kobayashi	425:12 (Nobuaki Ito); (Nobuhiko Kobayashi) 401
4/12/2001			X							X										LG: PJ Lee PHS: F. Albertazzi	PHLP-CRT-026830	Pil Jae Lee	
4/14/2001					X	X														HIT: Nobuaki Ito	HDP-CRT00048694	Nobuaki Ito Yuuichi Kumazawa	134:2, 190 (Nobuaki Ito); 65 (Yuuichi Kumazawa)
4/17/2001	Phillips-Chungli					X				X										HIT: Watanabe PHS: A. Wente PHS: R. Selbeck PHS: A. Lee PHS: R. Lu	HDP-CRT00029634		
4/19/2001		X	X	X	X					X										CPT: S.J. Yang CPT: C.C. Liu CPT: Edward Cheng SDI: Mr. D.Y. Kim SDI: Mr. Ha SDI: Mr. J.I. Lee LG: Mr. S.K. Lee LG: Mr. J.K. Han LG: Mr. K.Y. Ko OEC: Mr. J.H. Moon OEC: Mr. Jimmy Kim PHS: Mr. Jerry Lin PHS: Mr. J.K. Park	CHU00031123-125	S.J. Yang	S.J. Yang, Dep. Vol. 2, 251-252
4/20/2001	Shanghai	X							X											CPT: VP Liu CPT: Alex Yeh TSB: Ekihiro Yoshino TSB: AVP Suzuki TSB: Manager Du	CHU00028203	C.C. Liu	C.C. Liu, Dep. Vol. 2, 240-242
4/24/2001	N/A - email				X						X								X		PHLP-CRT-090140	Bob O'Brien	Bob O'Brien Dep. Vol. 1,; 105:7-108:18
4/24/2001	Shenzhen City, China	X	X		X	X								X	X				X	BMCC: Dae Lim Lee SEG/HIT: Kook Kyun Yang LG Changsha: Ah Pyung Yang Gwangdong CPT: Ui Hun Oh IRI: Hyo Rim Shin PHS: Soo Hwa Lee Shanghai Yunshin: Mr. Chang Shanghai Yunshin: Moon Oi Bun THOM: Hyang Gul Yang THOM: Ji Up Hwang SDI: Lim Bong Wang	SDCRT-0087340		
4/26-4/27/2001	China	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0089035	SK Park	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/00/2001	Taipei, Taiwan	X																	X		CHU00121161		
5/3/2001	email				X						X								X		PHLP-CRT-090221	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 173:5-177:8
5/6/2001	Sushi Taro, Washington D.C.					X	X		X											MEC: Nishiyama; HIT: Hirai; TSB: Kimura	MPDA_SEC-0896104	Kazumasa Hirai; Nishiyama	180:3 (Kazumasa Hirai); Nishiyama I at 162-66
5/7/2001	Grand Hyatt - Washington D.C.					X	X		X	X									X	HIT: Kazumasa Hirai, Tom Heiser PHS: Jeff Johnson TSB: John Webster MEC: Harry Nishiyama THOM: Alex Hepburn, Tom Carson, Tom Hallowell	PHLP-CRT-077930	Kazumasa Hirai, Tom Heiser	146:17 (Kazumasa Hirai) 147:13 (Tom Heiser)
5/7/2001						X				X									X	HIT: Heiser, K. Hirai	HEDUS-CRT00162777	Tom Heiser Kazumasa Hirai Thom Schmitt Noboru Toyama	140:3 (Tom Heiser) 347(Kazumasa Hirai) 224(Thom Schmitt) 213 (Noboru Toyama)
5/8/2001	email	X	X	X	X		X	X	X	X								X			PHLP-CRT-026590	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 222:9-227:7
5/17/2001	Berlin, Germany				X					X									X	THOM: Christian Lissorgues DOSA: Hee Cheol Moon DOSA: Kyung Hoon Choi SDI: Rak Jin Kim SDI: Jeong Sik Yoon PHS: Leo Mink	SDCRT-0087667		
5/23/2001 - 5/24/2001	Taiwan	X		X	X						X										SDCRT-0087414	J.I. Lee	
5/23/2001	Email										X								X		PHLP-CRT-02656	Kris Mortier	Kris Mortier Dep.Vol. 2, 492-499
5/24/2001					X	X														HIT: Genichi Watanabe SDI: Arimoto	HDP-CRT00049291, HEDUS-CRT00027271		
5/24/2001	Hitachi				X	X														HIT: Genichi Watanabe SDI: Tokyo President	HDP-CRT00049291	Kazumasa Hirai Noboru Toyama Yuuichi Kumazawa	294:3 (Kazumasa Hirai); 65 (Noboru Toyama) 400 (Yuuichi Kumazawa)
5/30/2001	email			X					X		X										PHLP-CRT-01642	Patrick Canavan	Patrick Canavan Dep. Vol. 2, 427:21-444:12
5/30/2001					X	X														HIT: Nobuaki Ito; Oohashi, Kuma, Kubo	HDP-CRT00048797	Nobuaki Ito Yuuichi Kumazawa	167:16 (Nobuaki Ito); 193 (Yuuichi Kumazawa)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/31/2001		X																	X	CPT: Mr. Liu CPT: Sheng-Jen Yang CPT: Director Chen CPT: Vice President Chen CPT: C.C. Liu CPT: Wen-Chun (Tony) Cheng CPT: Mei-Que Wang THOM: Mr. Fabac THOM: Peter Ho THOM: Anthony Lee THOM: Tony Liu	CHU00031136; CHU00031136E	C.C. Liu	C.C. Liu, Dep. Vol. 2, 242-244 Dep. Vol. 3, 545-548
6/4/2001	Spain			X	X					X	X								X	SDI - Sung Deok Park Phillips - L. Min, Kris Mortier Thomson - A. Martin Orion - Jae Suk Kim	SDCRT-0006510		
6/6/2001	U.S.				X					X									X	SDI: Cheol Hong Lim PHS: Joe Killen	SDCRT-0002582	Joseph Killen	148
6/6/2001		X					X													CPT: Yvonne Yun CPT: Edward Cheng MEC: Sales Section Chief Youhao Zhang	CHU00031137	C.C. Liu	C.C. Liu, Dep. Vol. 3, 531-536
6/7/2001		X			X															CPT: J.S. Lu CPT: C.C. Liu SDI: President Huang SDI: Mr. Xi	CHU00031138-139	J.S. Lu	J.S. Lu, Dep. Vol. 2, 210-212
6/9/2001	Thomson Mexico Color picture tube Factory					X		X											X	HIT: Ryoji Hashimoto	HEDUS-CRT00027270	Tom Heiser	201 (Tom Heiser)
6/11/2001			X			X	X		X	X								X	X	HIT: Tom Heiser PHS: Pat Canavan	PHLP-CRT-090736	Tom Heiser	150:22, 397 (Tom Heiser)
6/15/2001	Greenville, S.C.					X				X										HIT: Kazumasa Hirai PHS: Daniel den Engelsen, Hemant Betrabet	PHLP-CRT-090934	Kazumasa Hirai	271:12 (Kazumasa Hirai)
6/22/2001					X	X														HIT: Kumazawa	HDP-CRT00026180	Nobuaki Ito Yuuichi Kumazawa	191:5 (Nobuaki Ito); 311 (Yuuichi Kumazawa)
6/26/2001		X	X	X	X															CPT: VP C.C. Liu CPT: Director S.J. Yang CPT: Edward Cheng SDI: Mr. Lee SDI: Mr. Park SDI: Mr. Michael Son LG: Mr. S.Y. Choi LG: Mr. K.J. Park Orlon: Mr. Cho Orlon: Mr. Kim	CHU00036414-415	C.C. Liu	C.C. Liu, Dep. Vol. 2, 244-245
6/26/2001					X															SDI - Michael Son	SDCRT-0005830; CHU00036414	Michael Son	
6/26/2001	China																				SDCRT-0007599		
6/27/2001			X	X	X																		117:3-7

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/27/2001		X	X	X	X															CPT: VP C.C. Liu CPT: Director Yang CPT: Edward Cheng SDI: Mr. D.Y. Kim SDI: Mr. J.I. Lee SDI: Mr. Choi LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. J.K. Han LG: Mr. K.Y. Ko Orion: Mr. Lee Orion: Mr. Kang Orion: Mr. Jimmy Kim	CHU00031142-147	C.C. Liu	C.C. Liu, Dep. Vol. 2, 245-248 Dep. Vol. 3, 454-455
07/00/2001	Philips Atlanta				X	X				X	X									HIT: Thom Schmitt, Biff Kinney PHS: Christian Haring, Sukrit Mitra,	HEDUS-CRT00147432	Tom Heiser	359:04 (Tom Heiser)
7/0/2001		X	X	X	X					X											CHU00660395-407	C.C. Liu	C.C. Liu, Dep. Vol. 3, 451-461
7/1/2001		X	X	X	X						X										CHU00660454	Duk Chul Ryu	219
7/4/2001		X	X	X	X				X	X											TSB-CRT-00035348; TSB-CRT-00035350	Yasuki Yamamoto; Kazuhiro Nishimaru; Norio Fujita	Yamamoto: 233:10-246:23 Nishimaru: 149:14-178:7
7/5/2001	Luxembourg				X					X									X	PHS: Leo Mink THOM: Christian Lissorgues SDI: Lockjin Kim SDI: Jungsik Yoon DOSA: Heechul Moon DOSA: Kyounghoon Choi	SDCRT-0087664		
7/6/2001						X				X										HIT: Taku Yamanaka PHS: Reinoud Selbeck PHS: Hardy Lin PHS: Alex Lee PHS: George Chou PHS: Sala Liu	HDP-CRT00051624		
7/9/2001	Email				X						X										PHLP-CRT-028034	Kris Mortier	Kris Mortier Dep.Vol. 2, 406-410
7/24/2001		X	X	X	X															CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director Yang SDI: Mr. D.Y. Kim SDI: Mr. J.I. Lee SDI: Mr. Choi SDI: Mr. Park LG: Mr. S.Y. Choi LG: Mr. S.K. Lee LG: Mr. K.Y. Ko Orion: Mr. Cho Orion: Mr. Kang Orion: Mr. Jimmy Kim	CHU00031150-152	C.C. Liu	C.C. Liu, Dep. Vol. 2, 248-250

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/24/2001		X	X	X	X								X							CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director Tony Cheng CPT: Director S.J. Yang SDI: Mr. Michael Son SDI: Mr. J.I. Lee SDI: Mr. Park LG: Mr. S.Y. Choi LG: Mr. H.K. Lee LG: Mr. J.S. Kim Orion: Mr. Cho Orion: Mr. Adam Orion: Mr. Kim TCRT: Mr. Thanasak	CHU00036412-413	C.C. Liu	C.C. Liu, Dep. Vol. 2, 250-251
7/24/2001					X	X				X									X	HIT: Yuji Mitsumoto	HEDUS-CRT00162931	Tom Heiser Kazumasa Hirai (2387) Thom Schmitt (1838)	211:16 (Tom Heiser); 298, 320 (Kazumasa Hirai) 249:16 (Thom Schmitt)
7/24/2001	Taiwan				X															SDI - Michael Son	SDCRT-0087557		
8/00/2001	N/A: Admits to glass meeting participation	X	X	X	X					X										Jae In Lee (SDI); S.K. Park (SDI)	N/A	J.I. Lee	137:5
8/00/2001		X		X	X	X					X									HIT: Watanabe	HDP-CRT00035179	Nobuhiko Kobayashi	309 (Nobuhiko Kobayashi)
8/0/2001		X	X	X	X					X											CHU00660408	C.C. Liu	C.C. Liu, Dep. Vol. 3, 471-473
8/2/2001	email				X			X				X						X	X		PHLP-CRT-0938 13	Patrick Canavan	Patrick Canavan Dep. Vol. 2., 382:25-387:10
8/2/2001	N/A - email			X							X							X			JLJ-00004273	Bob O'Brien	Bob O'Brien Dep. Vol. 1,; 128:6-131:18
8/21/2001		X	X	X	X								X							CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director S.J. Yang SDI: Mr. Michael Son SDI: Mr. D.H. Lee LG: Mr. Lim LG: Mr. Edmond Park LG: Mr. J.S. Kim Orion: Mr. Adam Orion: Mr. Kim TCRT: Mr. Sirichai	CHU00036410-411	C.C. Liu	C.C. Liu, Dep. Vol. 2, 251-253
8/24/2001	Email & PPT										X										PHLP-CRT-091383 & Attachments (PHLP-CRT-091386; PHLP-CRT-091387; PHLP-CRT-091388)	Kris Mortier	Kris Mortier Dep.Vol. 1, 152-165
8/26/2001-8/31/2001	Germany				X														X	SDI: Michael Son	SDCRT-0087609		



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/29/2001	email										X	X									PHLP-CRT-091401	Bob O'Brien	Bob O'Brien Dep. Vol. 2,: 416:10-419:14
8/29/2001		X			X	X	X	X	X	X	X								X	HIT: Nobuaki Ito	HDP-CRT00026189	Nobuaki Ito Yuuichi Kumazawa	204:8, 524 (Nobuaki Ito); 317,369 (Yuuichi Kumazawa)
09/00/2001					X	X															HDP-CRT00026193	Nobuaki Ito	221:25 (Nobuaki Ito)
09/00/2001	Email				X	X														HIT: Nobuaki Ito, Yuuichi Kumazawa, Kazuo Oohashi SDI: Chong Woo Lee	HDP-CRT00026197	Nobuaki Ito Yuuichi Kumazawa	213:14 (Nobuaki Ito); 259 (Yuuichi Kumazawa)
09/00/2001					X	X			X		X							X			ILJ-00003298	Tom Heiser	158:14 (Tom Heiser)
9/1/2001	email but references Brazil		X		X						X										PHLP-CRT-91465	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 234:6-239:8
9/4/2001					X	X														HIT: Nobuaki Itou SDI: Choong Woo Lee	HDP-CRT00026197		
9/5/2001	Hitachi's Greenville plant					X				X										HIT: Toyama. PHS: Gotje	PHLP-CRT-091563	Noboru Toyama	134 (Noboru Toyama)
9/13/2001	Conference Room 856				X	X														HIT: Kumazawa SDI: Oyangi & Lee	HTO-CRT00051298	Yuuichi Kumazawa	251:9-17 (Yuuichi Kumazawa)
9/20/2001	Email				X						X										PHLP-CRT-043139 & Attachment	Kris Mortier	Kris Mortier Dep.Vol. 2, 417-422
9/26/2001	email				X	X					X										PHLP-CRT-091703	Patrick Canavan	Patrick Canavan Dep. Vol. 2, 459:8-471:3; 504:4-508:25
10/4/2001					X	X														HIT: Yuuichi Kumazawa	HDP-CRT00049201	Nobuaki Ito Yuuichi Kumazawa	237:21 (Nobuaki Ito); 296 (Yuuichi Kumazawa)
10/4/2001	n/a						X												X	MEC: Yuji Mitsumoto	HDP-CRT00026209		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/12/2001	Mobara, Japan		X			X				X										HIT: Watanabe HIT: Yoshiwara HIT: Yoshimi HIT: Shirai HIT: Sato	HDP-CRT00036262		
10/15/2001		X	X	X	X															CPT: C.C. Liu CPT: Edward Cheng SDI: Mr. Ahn SDI: Mr. Michael Son LG: Mr. Lim LG: Mr. Edmond Park LG: Mr. J.S. Kim Orion: Mr. Kim Orion: Mr. Yang Orion: Mr. Adam	CHU00660366-368	C.C. Liu	C.C. Liu, Dep. Vol. 2, 253-254
10/16/2001	La Quinta Resort, La Quinta, California					X				X									X	HIT: Thom Schmitt, Kazumasa Hirai, Thomas Heiser THOM: Alex Hepburn PHS: Jeff Johnson LPD: Bob O'Brien MEC: Harry Nishiyama	HEDUS-CRT00186930	Thom Schmitt	265:13 (Thom Schmitt)
10/18/2001 to 10/19/2001	China	X													X					CPT: S.J. Yang IRI: VP Ximin Wang IRI: Mr. Xiolin Shen IRI: Mr. Zhiyuan Wei IRI: Mr. Xiaohua Su IRI: Mr. Linghai Liu IRI: Ms. Yuan Liang	CHU00040992-993	S.J. Yang	S.J. Yang, Dep. Vol. 2, 305-309
10/23/2001		X			X						X									CPT: Tony Cheng CPT: C.Y. Lin SDI: Director Kim In SDI: Kim Doek-Yoen SDI: Park Sang-Kyu LPD: Director Joe LPD: Lee Seung-Kyu	CHU00028589-590	C.C. Liu	C.C. Liu, Dep. Vol. 2, 254-256
10/24/2001	Email				X						X										PHLP-CRT-033435	Kris Mortier	Kris Mortier Dep.Vol. 2, 410-413
10/25/2001	Korea		X	X	X															SDI - Michael Son	SDCRT-0087243		
10/26/2001	Brussels, Belgium	X			X					X								X	X	THOM: Giles Taldou THOM: Christian Lissorgues PHS: Mr. Mint (Leo Mink) PHS: Mr. Pos SDI: Mr. Neinke SDI: Lockjin Kim CPT: Mr. D. Ross SONY: Heechul Moon Schott: Mr. Raster BME: Mr. Zipfel ZVEI: Mr. Stoppok FEI: Mr. Faterhouse Sitelese: Mr. Oliver ANIE: Ms. Dr. Quattrocchi	SDCRT-0087670		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/28/2001	n/a	X	X	X		X	X		X	X			X		X	X		X	X		PHLP-CRT-095826		
11/00/2001						X				X										HIT: Biff Kinney PHS: Sukrit Mitra PHS: Helene Tacquet	HEDUS-CRT00006768		
11/5/2001	Hong Kong				X															SDI - Michael Son	SDCRT-0087652		
11/20/2001	Taiwan	X			X															SDI - Michael Son	SDCRT-0087542		
11/20/2001		X			X																		120:21
11/26/2001	Email										X								X		PHLP-CRT-092571	Kris Mortier	Kris Mortier Dep.Vol. 2, 499-502
11/26/2001	N/A - email										X								X		PHLP-CRT-092571	Bob O'Brien	Bob O'Brien Dep. Vol.: 1: 226:18-229:21
11/27/2001		X		X	X				X		X									Toshiba: Michael Du	TAEC-CRT-00087224	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 358:1-359:18 Ryan: 173:2-183:15
11/29/2001					X	X														HIT: Yuuichi Kumazawa	HTP-CRT00051340	Yuuichi Kumazawa	301:10-15 (Yuuichi Kumazawa)
11/30/2001 - 11/30/2003	North America					X													X	Market Allocation Agreement concerning 34" CPTs (HIT & THOM)	HDP-CRT00052643		
12/4/2001	Email	X	X	X	X		X		X		X							X			PHLP-CRT-094627	Kris Mortier; Bob O'Brien	Kris Mortier Dep.Vol. 1, 165-183; Bob O'Brien Dep. Vol. 1.: 159:9-181:18; Vol. 2.: 427:6-431:13
12/4/2001	Email										X										PHLP-CRT-094627	Kris Mortier	Kris Mortier Dep.Vol. 2, 581-589
12/10/2001	email				X						X										JU-00004606	Patrick Canavan	Patrick Canavan Dep. Vol. 2., 387:22-390:13

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/11/2001	email				X						X										PHLP-CRT-094860	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 136:14-141:16
12/17/2001		X		X	X						X									CPT: VP C.C. Liu CPT: Edward Cheng SDI: Mr. D.Y. Kim SDI: Mr. Park SDI: Mr. J.I. Lee LPD: Mr. S.Y. Choi LPD: Mr. Milan LPD: Mr. S.K. Lee LPD: Mr. K.Y. Ko Orion: Mr. Kang Orion: Mr. Yang Orion: Mr. Jimmy Kim	CHU00031172-173	C.C. Liu	C.C. Liu, Dep. Vol. 2, 256-257
12/17/2001		X			X				X		X										TAEC-CRT-00088054	Yasuki Yamamoto; Shinichiro Tsuruta; Dan Ryan; Norio Fujita	Yamamoto: 284:21-294:22 Tsuruta: 352:20-357:14 Ryan: 168:6-172:17
12/21/2001		X	X	X	X								X		X					CPT: S.J. Yang CPT: Maxim Chen SDI: Mr. D.E. Lee SDI: Mr. Park SDI: Mr. Ahn SDI: Mr. Son LG: Mr. Lim LG: Mr. Park Orion: Mr. Choe	CHU00036390-391	S.J. Yang	S.J. Yang, Dep. Vol. 2, 301-305
12/25/2001		X			X				X		X									Toshiba: Michael Du	TAEC-CRT-00088432	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 359:20-363:1 Ryan: 156:16-168:5
12/26/2001	Toshiba offices in Fukaya, Japana					X			X											HIT: Hideharu Sakamoto TSB: Imai TSB: Kuroki	HEDUS-CRT00185474		
After 2001	Bangkok								X			X	X							Toshiba or MTPD: Nishimaru, Kazuhiro Thai-CRT: Montri; Sirichai		Kazuhiro Nishimaru	122:10-129:9
After 2001	Bangkok								X				X							Toshiba or MTPD: Nishimaru, Kazuhiro Thai-CRT: Montri		Kazuhiro Nishimaru	131:4-132:5
2002																					SDCRT-0087291	KC Oh	
2002		X		X	X						X										SDCRT-0087963	I.H. Song	183:21-186:19
2002-2004	Korea				X						X	X								LPD: PJ Lee LPD: Mr. Yang LPD: HK Lee SDI: Mr. Lee MTPD: Mr. Kawano	n/a	Pil Jae Lee	128-148
2002-2004	Japan				X						X	X								LPD: PJ Lee LPD: Mr. Yang LPD: HK Lee SDI: Mr. Lee MTPD: Mr. Kawano	n/a	Pil Jae Lee	128-148

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2002-2004	Japan				X						X	X								LPD: PJ Lee LPD: Mr. Yang LPD: HK Lee SDI: Mr. Lee MTPD: Mr. Kawano	n/a	Pil Jae Lee	128-148
2002-2006	U.S. (Ohio; Detroit; Washington, DC)						X												X	MEC: Shinichi Iwamoto THOM: James Hanrahan		Shinichi Iwamoto	45-55, 81, 262-64, 359-62
1/4/2002		X	X	X	X					X	X									CPT: J.S. Lu SDI: Park Sang Kyu SDI: Anita LPD: L.S. Kyu OEC: Manager Han	CHU00031176	J.S. Lu	J.S. Lu, Dep. Vol. 2, 155-157
1/7/2002		X			X				X		X									Toshiba: Michael Du	TAEC-CRT-00088715	Yasuki Yamamoto; Shinichiro Tsuruta; Dan Ryan; Norio Fujita	Yamamoto: 295:17-306:17; Tsuruta: 363:4-367:23 Ryan: 187:19-191:21
1/9/2002						X					X									HIT: Thom Schmitt	HEDUS-CRT00187137	Tom Heiser	409:17 (Tom Heiser)
1/9/2002		X			X															SDI - Dae Eui Lee Chunghwa - S.J. Yang	SDCRT-0006266	Dae Eui Lee	257:11-259:2
1/11/2002	U.S.						X				X								X	LPD: Ney Corsino THOM: Tom Carson MEC: Nakamoto	JU-00004807	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 262:12-270:18
1/14/2002					X						X										PHLP-CRT-084379	Kris Mortier	Kris Mortier Dep.Vol. 1, 184-188
1/15/2002	Email					X			X											HIT: Kumazawa, Ito TSB: Wakiyama	HTP-CRT00026227	Yuuichi Kumazawa	199:9-25, 200:1-12 (Yuuichi Kumazawa)
1/18/2002	N/A - email				X						X										PHLP-CRT-095739	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 137:5-141:6
1/18/2002		X		X	X						X									CPT: VP C.C. Liu CPT: Edward Cheng SDI: Mr. D.Y. Kim SDI: Mr. Park SDI: Mr. Choi LPD: Mr. S.Y. Choi LPD: Mr. Milan LPD: Mr. S.K. Lee LPD: Mr. K.Y. Ko Orion: Mr. Lee Orion: Mr. Kang Orion: Mr. Yang Orion: Mr. Jimmy Kim	CHU00031178-179	C.C. Liu	C.C. Liu, Dep. Vol. 2, 257-259
1/18/2002		X		X	X						X									CPT: C.C. Liu CPT: Edward Cheng SDI: Mr. Lee SDI: Mr. Park SDI: Mr. Ahn LPD: Mr. Choi LPD: Mr. Lim LPD: Mr. Edmond Park Orion: Mr. Lee Orion: Mr. Kim Orion: Mr. Adam Choe	CHU00036392-393	C.C. Liu	C.C. Liu, Dep. Vol. 2, 259-260

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1/18/2002					X	X														HIT: Nobuaki Ito, SDI: Chong Woo Lee	HDP-CRT00049440	Nobuaki Ito	228:09 (Nobuaki Ito)
1/21/2002		X		X	X				X		X									Toshiba: Michael Du	TAEC-CRT-00089342	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 368:1-370:16 Ryan: 192:2-195:24
1/23/2002		X		X	X					X	X									CPT: C.C. Liu CPT: Edward Cheng CPT: Tony Cheng CPT: Edward Cheng SDI: Mr. Park LPD: Mr. S.K. Lee LPD: Mr. Han Orion: Mr. Park	CHU00031180-181	C.C. Liu	C.C. Liu, Dep. Vol. 2, 317-319
1/29/2002		X			X				X		X									Toshiba: Michael Du	TAEC-CRT-00089968	Yasuki Yamamoto; Shinichiro Tsuruta; Dan Ryan; Norio Fujita	Yamamoto: 306:19-314:1; Tsuruta: 370:19-377:9 Ryan: 196:1-201:18
1/30/2002		X	X							X	X									CPT: VP C.C. Liu CPT: Edward Cheng CPT: Director Tony Cheng LPD: Xiang-Long Cui LPD: Seung Kyu Lee	CHU00031182	C.C. Liu	C.C. Liu, Dep. Vol. 2, 260-262
2/4/2002		X							X											Toshiba: Michael Du	TAEC-CRT-00090127	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 298:14-309:15 Ryan: 201:19-207:18
2/6/2002					X							X								Hun Sul Chu (SDI); Sanogawaya (MTPD)	SDCRT-0007277	KC Oh	
2/8/2002	Nippon Building	X			X	X	X													HIT: Nobuaki Ito	HDP-CRT00026234	Nobuaki Ito	382:21 (Nobuaki Ito)
2/12/2002	Email										X										PHLP-CRT-096369 & Attachment (PHLP-CRT-096371)	Kris Mortier	Kris Mortier Dep.Vol. 1, 188-193
2/22/2002		X		X	X						X									SDI: Ahn, Park and SDI: Lee; LPD: Lim, E. Park; Orion: Kim and Orion: Nan; CPT: S. Jen, Y. Shih-Ming, CPT: C. Ling-Yun, CPT: C. Ling-Yuan and CPT: Yun.	CHU00036394	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 310:4-320:18
2/25/2002					X				X											Toshiba: Yasuki Yamamoto SDI: Jo, J.	TSB-CRT-00041862	Yasuki Yamamoto	247:1-250:19; 261:2-271:7
2/25/2002		X		X	X				X		X									Toshiba: Michael Du	TAEC-CRT-00056158; TAEC-CRT-00091751	Dan Ryan	219:25-22
3/1/2002	email				X						X										PHLP-CRT-097351	Joseph Killen	Joseph Killen Dep. 167:4-186:1; 205:10-208:12; 269:19-270:4
3/4/2002	N/A - email				X						X										PHLP-CRT-097351	Bob O'Brien	Bob O'Brien Dep. Vol. 1,; 141:11-143:16; Vol. 2,; 423:15-427:4
3/13/2002						X	X	X	X	X								X	X		HDP-CRT00004413		
3/14/2002	CSO Office		X							X	X										PHLP-CRT-014609	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 302:16-309:13

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/18/2002					X						X									LPD: PJ Lee	PHLP-CRT 098241	Pil Jae Lee	190
3/19/2002	Email				X						X										PHLP-CRT098241	Kris Mortier	Kris Mortier Dep.Vol. 1, 309-313
3/19/2002	email				X						X										JLJ-00005511	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 142:9-148:12
3/19/2002	email attachment	X	X	X	X	X		X	X		X	X						X	X		JLJ-00005514	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 149:6-159:6
3/25/2002		X		X	X				X		X									Toshiba: Michael Du	TAEC-CRT-00093312	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 378:9-381:20 Ryan: 227:10-23
3/26/2002					X	X														HIT: Kumazawa SDI: Lee	HTP-CRT00049313	Yuuichi Kumazawa	266:22-25, 267:1 (Yuuichi Kumazawa)
3/26/2002	Changsa City, Hunan Province, China	X	X		X					X											SDCRT-0087944	Hoon Choi	122:08
3/27/2002					X	X														HIT: Kumazawa SDI: Lee	HDP-CRT00026272	Yuuichi Kumazawa	270:6-25 (Yuuichi Kumazawa)
3/28/2002	Email				X	X														HIT: Kumazawa SDI: Lee	HTP-CRT00056188	Yuuichi Kumazawa	277:9-22, 279:14-18, 280:20-24 (Yuuichi Kumazawa)
Q4 2002					X							X									SDCRT-0007279	HS Chu	
4/00/2002						X			X											HIT: Kumazawa TSB: Wakiyama	HDP-CRT00051407	Yuuichi Kumazawa	386:3-14 (Yuuichi Kumazawa)
4/1/2002					X		X													MEC: Kinoshita; SDI: Kim	MTPD-0426017	Kinoshita	Kinoshita II at 318-24

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/17/2002						X			X											HIT: Yuuichi Kumazawa TSB: Wakiyama	HDP-CRT00051358		
4/18/2002						X			X											HIT: Yuuichi Kumazawa TSB: Wakiyama	HDP-CRT00051407		
4/18/2002					X				X											SDI: Jo (CDT Sales GM) Toshiba: Yamamoto, Yasuki	TSB-CRT-00041870	Yasuki Yamamoto; Kazuhiro Nishimaru	Yamamoto: 221:13-227:10 Nishimaru: 271:1-273:23
4/19/2002					X				X		X									LPD: Phil Lee	PHLP-CRT-012646	Pil Jae Lee	291
4/22/2002		X		X	X						X		X						X		CHU00660373	C.C. Liu	C.C. Liu, Dep. Vol. 3, 474-478
4/24/2002		X		X	X						X									CPT: Edward Cheng CPT: Yvonne Yun SDI: Mr. Kevin Park LPD: Mr. Edmond Park Orion: Mr. Nam Orion: Mr. Adam Choe	CHU00030406-407	C.C. Liu	C.C. Liu, Dep. Vol. 2, 262-264
4/29/2002	Email						X		X		X							X		LPD: Kris Mortier LPD: Leo Mink Toshiba: Keisuke Wakiyama Toshiba: Kurosawa Thomson: Martina Panasonic: Norikazu Nakanishi Sony: Takayoshi Kitawaki Sony: Toshiya Shiga Sony: Yoko Hayashi	MTPD-0331740	Kris Mortier	Kris Mortier Dep.Vol. 2, 437-439
4/30/2002		X		X	X				X		X									Toshiba: Michael Du	TAEC-CRT-00095236	Dan Ryan	234:8-238:6
5/13/2002					X	X														HIT: Watanabe SDI: Pak, Kim, Rhee	HDP-CRT00049470	Noboru Toyama	204 (Noboru Toyama)
5/16/2002	Email				X						X								X		PHLP-CRT-14431 & Attachment (PHLP-CRT-134432)	Kris Mortier	Kris Mortier Dep.Vol. 1, 194-202
5/22/2002	Indonesia	X			X				X		X	X	X							LPD - B. Jeon, B. Lee, Kyu Hwa, Yong Joon, K. Park SDI - C. Ahn, C. Lee, S.K. Park, D. Bae, Dae Eui Lee, Chungghwa Yang, Chen Thai CRT - Montri Toshiba/MPTD - Yasukawa		Dae Eui Lee	268:10-274:1



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/22/2002	Indonesia	X			X				X		X	X	X							LPD - B. Jeon, B. Lee, Kyu Hwa, Yong Joon, K. Park SDI - C. Ahn, C. Lee, S.K. Park, D. Bae, Dae Eui Lee, Chunghwa Yang, Chen Thai CRT - Montri Toshiba/MPTD - Yasukawa	SDCRT-0088715		
5/27/2002		X	X	X	X	X	X	X	X	X	X		X		X			X	X	LPD: PJ Lee	PHLP-CRT-014816 PHLP-CRT-014272	Pil Jae Lee	203 287
5/27/2002		X			X				X		X									Toshiba: Michael Du	TAEC-CRT-00096166	Shinichiro Tsuruta; Dan Ryan	Tsuruta: 382:22- 384:22 Ryan: 243:11-24
5/28/2002	Korea	X		X	X						X									SDI - Joon Seok Ahn, Sung Doek Park, Bo Kyung Lee LPD - Sung Dae Lim, Joon Yong Park Orion - Young Jae Kim, Gil Nam, Gyu Chul Choi, Jae Suk Kim Chunghwa - S.J. Yang	SDCRT-0007585 (Ex. 675)	Dae Eui Lee	260:15-264:1
5/30/2002	Email				X				X		X										PHLP-CRT-014272	Kris Mortier	Kris Mortier Dep.Vol. 1, 313-317
06/00/2002					X	X															HDP-CRT00004468	Nobuaki Ito	211:03 (Nobuaki Ito)
6/6/2002		X			X															SDI - Dae Eui Lee Chunghwa - S.J. Yang	SDCRT-0007602	Dae Eui Lee	264:11-266:7
6/6/2002	Thailand	X																	X	Thompson - Peter Ho Chunghwa - S.J. Yang	SDCRT-0007602		
6/11/2002. 7/11/2002	Tokyo, Osaka										X	X							X	TSB: S. Trinker, TSB: K. Mortier.	JLJ-00001899	Patrick Canavan	Patrick Canavan Dep. Vol. 2, 396:10-398:21
6/13/2002		X			X				X		X									Toshiba: Michael Du	TAEC-CRT-00096935	Shinichiro Tsuruta; Dan Ryan; Norio Fujita	Tsuruta: 384:24- 387:22 Ryan: 265:3-277:9
6/13/2002	phone call						X		X											MEC: Sanogawaya	MTPD-0024384	Sanogawaya	Sanagowaya III at 407-12
6/14/2002	Samsung's Tijuana factory				X															MEC: Kinoshita	MTPD-0042010	Kinoshita	Kinoshita I at 67-77
6/27/2002	Rome, Italy				X						X								X	LPD: Leo Mink THOM: Emeric Charamel SDI: Rak Jin Kim DOSA: Kyung Hoon	SDCRT-0087705		
7/3/2002					X	X														HIT: Yuuichi Kumazawa HIT: Nobuaki Itou	HDP-CRT00051412		
7/7/2002	n/a	X		X	X		X				X							X	X		LPD_00042916		
7/18/2002	Email				X						X									LPD: Kris Mortier LPD: Jun Yong Park SDI: Jae In Lee SDI: Sung Deok Park	SDCRT-0006799-6800	Kris Mortier	Kris Mortier Dep.Vol. 1, 318-323
7/19/2002		X	X	X	X	X	X	X	X	X			X		X	X		X	X	LPD: PJ Lee	PHLP-CRT-020282	Pil Jae Lee	158

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/15/2002	U.S.				X					X		X		X					X	MTPD: Shigazu Shibata MTPD: Shinichi Iwamoto MTPD: Ayumu Kinoshita MTPD: Mike Nakamoto MTPD: Takaki Kokado THOM: J.P. Hanrahan	MTPD-0223790		
8/16/2002							X												X	MEC: Iwamoto	MTPD-0223790	Iwamoto	Iwamoto I at 190-97
8/28/2002	Mobara, Japan	X				X														HIT: Yoshiichi Arita CPT: S.C. Chen	HDP-CRT00037711		
9/00/2002	Paris, France					X													X	HIT: K. Hirai HIT: Garry Gwaltney PHS: Sukrit Mitra PHS: Christian Haring	HEDUS-CRT00007566		
9/00/2002						X				X									X	HIT: K. Hirai HIT: Garry Gwaltney PHS: Sukrit Mitra PHS: Christian Haring	HEDUS-CRT00007566		
9/3/2002	N/A - email								X		X										PHLP-CRT-087780	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 258:7-263:25
9/13/2002		X							X											CPT: Maxim Chen CPT: Jeff Yue	CHU00030414-018	S.J. Yang	S.J. Yang, Dep. Vol. 2, 252-255 Dep. Vol. 3, 362-365
9/27/2002	Brussels, Belgium	X		X	X		X				X							X	X	THOM: Didier Trutt THOM: Christian Lissorgues Ekranas: Alain Clement Schott: Max Raster Schott: Stefan Georgi SDI: Helmut Meinke LPD: Felice Albertazzi LPD: Leo Mink EECA EDIA: Anne-Marie Leclercq	PHLP-CRT-010790		
10/4/2002	Email				X	X														HIT: Kazumasa Hirai SDI: unspecified	HDP-CRT00038398	Noboru Toyama	187 (Noboru Toyama)
10/8/2002	Parmesano Dayton Marriott Hotel					X	X													HIT: Kazumasa Hirai MEC: Shinichi Iwamoto	MTPD-0036413	Kazumasa Hirai	152:4, 170, 435 (Kazumasa Hirai)
10/16/2002					X		X													Hun Sul Chu (SDI);	SDCRT-0007266	HS Chu	
10/22/2002	U.S.					X			X		X			X					X	THOM: Tom Carson THOM: Alex Carson LPD: Jeff Johnson LPD: Bob O'Brien HIT: Thom Schmitt HIT: Jake Spengler BMCC: Elaine Sears	PHLP-CRT-087372		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
10/23/2002	email				X						X									SDI: C. Bycon, SDI: B. Lee, SDI: S. Kim; LPD: N. Corsino, LPD: C. Kim, LPD: E. Park	PHLP-CRT-087304	Patrick Canavan	Patrick Canavan Dep. Vol. 2,, 390:22-395:22; 489:3-499:11
11/4/2002	Email				X						X										PHLP-CRT-010267	Kris Mortier	Kris Mortier Dep.Vol. 2, 413-417
11/5/2002	Email	X									X										PHLP-CRT-012917	Kris Mortier	Kris Mortier Dep.Vol. 1, 247-249
11/8/2002				X		X	X		X		X		X								JLJ-0001899 & Attachment JLJ-00001901	Kris Mortier	Kris Mortier Dep.Vol. 1, 323-326
11/12/2002	Email						X		X		X	X									PHLP-CRT-087420	Kris Mortier	Kris Mortier Dep.Vol. 1, 326-330; Bob O'Brien Dep. Vol. 1,; 152:13-155:13
11/14/2002 - 11/15/2002	Jungli, China	X				X														HIT: Shouji Shirai CPT: K.C. Chen	HDP-CRT00038725, HDP-CRT00038733		
11/14/2002	Longwy, France			X	X															Sung Won Ahn (OEC); Kyung Hoon Choi (OEC); Rak Jin Kim (SDI); Sung Deok Park (SDI)	SDCRT-0006632	J.I. Lee; KC Oh	
11/15/2002	Paris				X														X	Agnes (Thomson); Francoise (Thomson); SD Park (SDI)	SDCRT-0006632	J.I. Lee; KC Oh	
11/17/2002 - 11/18/2002	China: Zhangjiajie		X		X	X				X				X	X					BMCC: Chae-hong HIT: Yongxin BMCC: Fan PHS: Zhang, Dezhu	SDCRT-0006674, SDCRT-0006675		
11/18/2002	Japan								X										X	THOM: Christian Lissorgues THOM: Emeric Charamel THOM: J.P. Hanrahan THOM: Jack Brunk THOM: A. Konuma TSB: T. Onda TSB: K. Ehara TSB: K. Nakana TSB: M. Mashinoto	TDA02994		
11/20/2002					X					X											SDCRT-0006442	KC Oh	
11/20/2002	Paris, France				X														X	SDI: Sung Deok Park THOM: Ms. Agnes THOM: Ms. Francoise	SDCRT-0006632	KC Oh; Jae In Lee	Oh 477; Lee 569

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/25/2002	Email					X			X											HIT: Yuuichi Kumazawa, Nobuaki Ito TSB: Keisuke Wakiyama	HDP-CRT00026077	Nobuaki Ito Yuuichi Kumazawa	262:4 (Nobuaki Ito); 207, 387 (Yuuichi Kumazawa)
11/28/2002		X			X						X										SDCRT-0006043E	I.H. Song; Hoon Choi	Song: 195:19-198:24; Choi: 124:16
12/6/2002					X				X		X										SDCRT-0087934		
12/10/2002	Mexico				X						X										SDCRT-0087934		
12/15/2002					X						X										PHLP-CRT-005637	Pil Jae Lee	311
12/16/2002		X			X						X										SDCRT-0088832	I.H. Song	238:19-241:1
12/17/2002		X		X							X									CPT: S.J. Yang CPT: Maxim Chen	CHU00030559-562	S.J. Yang	S.J. Yang, Dep. Vol. 2, 255-259 Dep. Vol. 3, 365-368
12/18/2002	Email										X										PHLP-CRT-014413 & Attachment (PHLP-CRT- 014414)	Kris Mortier	Kris Mortier Dep.Vol. 1, 202-212
12/22/2002		X			X						X									Tony Cheng	SDCRT-0087953	I.H. Song	174:7-176:14, 178:14- 23, 181:13-182:1, 183:4-19
12/27/2002					X		X													MEC: Nishiyama	SDCRT-0006670	Nishiyama	Nishiyama III at 407- 10
12/27/2002					X		X													MEC: Sanogawaya	MTPD-0222758	Sanogawaya	Sanogawaya III at 472- 77
2003	n/a				X														X		SDCRT-0088604		
2003	n/a				X														X	THOM: CL (Christian Lissorgues)	TDA01365		
2003-2004					X						X	X								MTPD: Yamamoto, Yasuki		Yasuki Yamamoto	83:22-86:9
2003-2004					X						X	X								MTPD: Yamamoto, Yasuki		Yasuki Yamamoto	83:22-86:9
2003-2004					X						X	X								MTPD: Yamamoto, Yasuki		Yasuki Yamamoto	83:22-86:9
1/00/2003- 3/00/2003	South Korea				X				X		X									Toshiba: Yamamoto, Yasuki; Kawano; Wakiyama		Yasuki Yamamoto	117:22-121:23; 136:3- 137:3
1/00/2003					X																SDCRT-0007280	KC Oh	
1/1/2003		X			X						X									CPT: C.C. Liu CPT: Yvonne Yuan CPT: VP Chan CPT: Alex Yeh	CHU00031804	C.C. Liu	C.C. Liu, Dep. Vol. 2, 264-267
1/8/2003	N/A - email	X		X							X										PHLP-CRT-013964	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 200:4-214:24
1/8/2003	Garden Cafe, Harrah's Las Vegas					X				X										HIT: Tom Heiser, Thom Schmitt, JS, SB, PHS: C. Haring, S. Little	HEDUS-CRT00166481	Tom Heiser	244:06 (Tom Heiser)
1/8/2003	La Playa Lounge, Harrah's Las Vegas					X													X	HIT: Tom Heiser, Thom Schmitt, AP SB THOM: G. O'Donnel, J.P. Colin	HEDUS-CRT00166481	Tom Heiser	244:06 (Tom Heiser)

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1/9/2003	email				X															IDC : B. O'Donnell SDI: J. Lee and SDI: H. Choi; SRI: S. Nebrich,	SDCRT-0005172_CT	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 183:6-197:2
1/9/2003	U.S.				X						X									LPD - Chang Hoo Kim	SDCRT-0087934		
1/10/2003	email				X						X									LPD: P. Canavan, LPD: R. O'Brien; SDI: J. Lee and SDI: H. Choi	SDCRT-0005170_CT	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 183:6-197:2
1/13/2003	N/A - email										X	X									MTPD-0197518	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 267:9-272:~24
1/29/2003	Email				X						X			X	X			X	X		PHLP-CRT-014465 & Attachments (PHLP-CRT-014469; 14470)	Kris Mortier	Kris Mortier Dep.Vol. 1, 212-224
2/00/2003					X				X		X										SDCRT-0087934		
2/3/2003	Ann Arbor, MI				X						X										PTC-00004295	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 251:20-258:2
2/10/2003	email	X		X	X	X		X	X	X	X	X						X	X		PHLP-CRT-015233	Joseph Killen	Joseph Killen Dep. 208:17-219:6; 269:19-270:4
2/10/2003					X						X	X									SDCRT-0088705	J.I. Lee	
2/19/2003					X						X									Moon Jin Choi (LPD); Eui Seob Jo (SDI)	SDCRT-0005933	KC Oh	
2/21/2003		X							X		X		X							CPT: S.J. Yang CPT: Maxim Chen	CHU00020660	S.J. Yang	S.J. Yang, Dep. Vol. 2, 259-262
2/24/2003	Marriott Hotel, Korea	X			X						X										SDCRT-0091605		
2/24/2003	EIA meeting				X		X													MEC: Nishiyama	PHLP-CRT-089887; SDCRT-0007282	Nishiyama	Nishiyama I at 96-98
2/26/2003	Taiwan	X					X													CPT: Liu, Chih-Chun (C.C.) (Vice President); Yang, Sheng-Jen (S.J.)(Assistant Vice President); Chen, Shih-Ming (Maxim) MEC: Tomori (CPT Sales Manager, MDDM); Koga (Sales Manager, MDDM)	CHU00020661 CHU00030080 CHU00030553		
2/27/2003	Taiwan	X											X							CPT: Liu, Chih-Chun (C.C.) (Vice President); Yang, Sheng-Jen (S.J.)(Assistant Vice President); Chen, Shih-Ming (Maxim) T-CRT: Kanet (Managing Director); Montri (Sales & Marketing Manager)	CHU00020661 CHU00030080 CHU00030553		
2/28/2003	Taiwan	X							X											CPT: Liu, Chih-Chun (C.C.) (Vice President); Yang, Sheng-Jen (S.J.)(Assistant Vice President); Chen, Shih-Ming (Maxim) TSB: Ohmori (Sales & Marketing Senior Manager, TDDT); Nishimaru (Sales & Marketing Manager, TDDT)	CHU00020661 CHU00030080 CHU00030553	Kazuhiro Nishimaru	274:22-278:9

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/28/2003	N/A - email		X								X	X									MTPD-0218782	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 273:11-277:16
3/00/2003					X				X		X										SDCRT-0087934		
3/3/2003	SDI Conference Room				X			X												Deok Yeon Kim (SDI); Eui-sub Cho (SDI); Jae-in Lee (SDI); Nakashima (Mitsubishi); Katou (Koshida-tech)	SDCRT-0006041	I.H. Song	221:22-223:11
3/3/2003-3/11/2003	San Diego; Mexico				X						X	X							X	KC Oh (SDI)	SDCRT-0076953; SDCRT-0076954	KC Oh	82:18-83:11
3/5/2003	N/A - email								X		X										JLJ-00001928	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 264:5-266:25
3/7/2003	email										X	X									MTPD-0198889	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 277:21-281:7
3/7/2003	email										X	X									MTPD-0226478	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 281:12-285:11
3/10/2003					X							X								MTPD: Kinoshita	MTPD-0223553;MTPD-0025531	Kinoshita	Kinoshita I at 150-51
3/12/2003						X						X								HIT: Nobuaki Ito MTPD: Mr. Nishimura	HDP-CRT00026082	Nobuaki Ito	93:09 (Nobuaki Ito)
3/12/2003					X															Sang Cheol Yoon (DOMEX); CH Im (SDI)	SDCRT-0002514	KC Oh	
3/23/2003					X														X		SDCRT-0002515	KC Oh	
3/24/2003	Atlanta, GA					X	X													HIT: Kazumasa Hirai, Nakanishi MEC: Shinichi, (Steve) Iwamoto, President Mike Nakamoto	MTPD-0025523	Kazumasa Hirai	183:06 (Kazumasa Hirai)
3/24/2003	Atlanta, GA					X	X													HIT: Kazumasa Hirai Yosuke Nakanishi, Kumiko Wilson, MEC: Shinichi (Steve) Iwamoto, President Mike Nakamoto	MTPD-0042965	Kazumasa Hirai	194:13, 435 (Kazumasa Hirai)
3/24/2003	Atlanta, GA					X	X													HIT: Kazumasa Hirai MEC: Shinichi (Steve) Iwamoto	MTPD-0041033	Kazumasa Hirai	202:3 (Kazumasa Hirai)
3/27/2003	Shenzhen	X			X						X									CPT: J.S. Lu SSDI: Zhen Yang LPD: Yu Tian LPD: VP Shenglie Xin LPD: Minghui Xu LPD: Jiangnan Yu	CHU00031822	J.S. Lu	J.S. Lu, Dep. Vol. 2, 166-167
After March 2003	Bangkok	X										X								MTPD: Nishimaru, Kazuhiro; Omori		Kazuhiro Nishimaru	130:2-131:2; 132:16-132:23
After March 2003	Bangkok										X	X								MTPD: Nishimaru, Kazuhiro		Kazuhiro Nishimaru	131:20-132:15
April 2003-March 2005		X			X						X	X	X							MTPD: Nishimura, Kazutaka		Kazutaka Nishimura	
April 2003-March 2005		X			X						X	X	X							MTPD: Nishimura, Kazutaka		Kazutaka Nishimura	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
April 2003-March 2005		X			X						X	X	X							MTPD: Nishimura, Kazutaka		Kazutaka Nishimura	
4/10/2003	Email				X			X			X							X	X		PHLP-CRT-022244 [Attachments at -022245 and 022246]	Kris Mortier	Kris Mortier Dep.Vol. 1, 249-256
4/10/2003					X						X								X	SDI: KC Oh SDI: KH Kim SDI: Gabriel LJ Kim Ekranas: Mr. Zvybas Ekranas: Mr. Clement Mun Bong Choi Charamel LPD: Thomson:	SDCRT-0006903	KC Oh	206
4/14/2003	Japan: Sony Osaki Office					X	X	X										X		SONY: Toshiya Shiga HIT: Nobuaki Itou HIT: Kawamura Katsuyuki MIT: Norikazu Nakanishi	HDP-CRT00022991, HDP-CRT00022994, HDP-CRT00022995, HDP-CRT00022996		
4/25/2003					X						X	X								MTPD: Kawano; Sanogawaya; Tanaka; Nishimura SDI: Lee, Dong Hoon; Ahn, John S.; Jo, E.K.; Lee, Seungmin LPD: Yang, Yeong-Ug; Lee, Hwa-Kyu; Lim, Sung-Dai; Park, Edmond	MTPD-0423675	Kazutaka Nishimura	
4/25/2003		X			X														X		SDCRT-0088713		
4/25/2003					X						X	X								LPD: Yang, Yeong-Ug LPD: Lee, Hwa-Kyu LPD: Lim, Sung-Dai LPD: Park, Edmond MTPD: Kawano MTPD: Sanogawaya MTPD: Tanaka MTPD: Nishimura MTPD: Nakanishi SDI: Lee, Dong Hoon SDI: Ahn, John S. SDI: Jo, E.K. SDI: Lee, Seungmin	MTPD-0423675; MTPD-0573683	Sanogawaya Nishimura	Sangowaya II at 210-13 Nishimura II at 172-84
4/29/2003					X						X									Joel Garbi (LPD); Joao Gordo (LPD); Sung Shik Kim (SDI); Francisco (SDI)	SDCRT-0093913	KC Oh	
4/30/2003		X			X						X									CPT: S.J. Yang SDI: VP Dong-Shun Lee SDI: Jun-Zhe An SDI: Zai-Ren Lee LPD: VP Yong-Shu Liang LPD: Hua-Sheng Lee LPD: Sheng-Da Lin	CHU00123742	S.J. Yang	S.J. Yang, Dep. Vol. 3, 350-355
4/30/2003					X						X									Joel Garbi (LPD); Joao Gordo (LPD); Sung Shik Kim (SDI); Francisco (SDI)	SDCRT-0093913	KC Oh	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY	
5/1/2003	email				X			X			X	X								X		MTPD-0011040	Bob O'Brien	Bob O'Brien Dep. Vol. 1.; 286:6-294:13; Dep. Vol. 2.; 437:6-438:7
5/2/2003	U.S.				X														X	SDI: Woongrae Kim SDI: Dong Suk Lee THOM: J.P. Hanrahan THOM: Jack Brunk	SDCRT-0007239	KC Oh	445	
5/9/2003					X	X								X	X					Wenqiang Fan; Jianshe Wei; Xiaolin Shen; Xiuhua Li; Zhiping Xu; Guojun Yang; Weixian Wu; Yaping Yang; S.K. Sung	BMCC-CRT000142063			
5/13/2003	email				X						X	X									MTPD-0276153	Bob O'Brien	Bob O'Brien Dep. Vol. 2.; 329:17-335:15; 438:11-18	
5/20/2003		X			X						X										SDCRT-0088791	I.H. Song	209:3-210:25, 217:14-221:3	
5/21/2003					X							X								Hun Sul Chu (SDI)	SDCR T-0070524	HS Chu		
6/2-4/2003											X	X							X	MTPD: Nakamoto MTPD: Shibata	MTPD-0013872			
6/4/2003	Spain				X					X									X	(SDI): S. D. Park; EECA: Anne-Marie Leclercq; Phillips: Leo Mink, Phillips: Kris Mortier; Thomson: A. Martin; EIAK: Hong Sik Kang, and EIAK: In Su Lee	Samsung 2nd Supplemental Response p 63	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550	
6/5/2003 - 6/9/2003					X						X									Woo Seok Huh (SDI)	SDCRT-0006927	KC Oh		
6/6/2003	email				X						X	X									MTPD-0276234	Bob O'Brien	Bob O'Brien Dep. Vol. 2.; 338:9-343:19; 439:24-440:6	
6/9/2003	email and attachment				X						X										SDCRT0006927; SDCRT0006928	Bob O'Brien	Bob O'Brien Dep. Vol. 2.; 358:14-360:16; 442:3-442:17; Vol. 2.; 360:18-362:2	
6/9/2003												X							X	MTPD: Shigkazu Shibata	MTPD-0011066			
6/10/2003	n/a				X														X	THOM: James Hanrahan THOM: Jack Brunk THOM: Christian Lissorgues	TDA01360			
6/12/2003		X			X						X										SDCRT-0088798	I.H. Song	224:21-226:24	



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/13/2003					X						X								X	EECA: Anne-Marie Leclercq LPD: Leo Mink LPD: Kris Mortier THOM: A. Martin SDI: Kevin Park	SDCRT-0006510 & SDCRT-0006510E	Kris Mortier	Kris Mortier Dep.Vol. 2, 434-437
6/25/2003											X	X								LPD: B. O'Brien. MTPD: S. Lammers, MTPD: N. Bray, MTPD: S. Iwamoto, MTPD: M. Nakamoto, MTPD: C. Read.	MTPD-0016475	Bob O'Brien	Bob O'Brien Dep. Vol. 2,: 335:19-338:5; 438:21-439:23
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
July 2003-June 2006	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray		Norio Fujita	
7/2/2003	Thomson Mexicali factory											X							X	MTPD: Alex Kinoshita MTPD: Kazutaka Nishimura	MTPD-0035375	Kazutaka Nishimura; Ayumu Kinoshita 30(b)(6); Shinichi Iwamoto 30(b)(6)	Kinoshita 30(b)(6) 121, 393; Iwamoto 30(b)(6) 332; Nishimura II at 185-89
7/14/2003						X						X								HIT: Nobuaki Ito MTPD: Kazutaka Nishimura	HDP-CRT00026313	Nobuaki Ito	265:14 (Nobuaki Ito)
7/17/2003						X						X								HIT: Nobuaki Ito MTPD: Kazutaka Nishimura	HDP-CRT00026313	Nobuaki Ito	265:14 (Nobuaki Ito)
7/18/2003	U.S.				X						X								X	LPD: Quin Choi SDI: KC Oh THOM: Jack Brunk	SDCRT-0007173	KC Oh	210
7/22/2003	MIT's Mexico factory					X			X											HIT: Shibuya MIT: Shinagawa	HEDUS-CRT00000531	Noboru Toyama	183 (Noboru Toyama)
7/25/2003					X						X	X										J.I. Lee	
7/26/2003	Santee, CA				X						X								X			KC Oh	
8/5/2003					X						X	X								Eisaburo Himano (MTPD); Hisashi Matsuda (MTPD); Tomoyuki Kawano (MTPD); Chang Hu Kim (LPD)	SDCRT-0088726	J.I. Lee	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/6/2003										X		X						X	X	MTPD: Shigkazu Shibata	MTPD-0426070		
8/19/2003	U.S.											X							X	THOM: J.P. Hanrahan THOM: J.R. Hirschler MTPD: President Shibata MTPD: Iwamoto MTPD: Usuda	MTPD-0576483		
8/28/2003		X			X						X										CHU00660606	C.C. Liu	C.C. Liu, Dep. Vol. 3, 478-485
9/5/2003	Bangkok, Thailand	X			X						X	X	X							D.E. Lee (SDI); Jae In Lee (SDI); Byung Koo Jeong (LPD); Yong Ik Jeong (LPD); Joon Young Park (LPD); Yang (CPT); Chen (CPT); Montri (TCRT); Cirichai (TCRT); Yasukawa (MTPD)	SDCRT-0088732	J.I. Lee	
9/5/2003	Thailand	X			X						X	X	X							SDI - Dae Eui Lee, Jae In Lee LPD - Byung Koo Jeong, Yong Ik Jeong, Joon Young Park Chunghwa - Mr. Yang, Mr. Chen Thai CRT - Mr. Montri, Mr. Cirichai MTPD - Yasukawa	SDCRT-0088732	Dae Eui Lee	276:12-279:24
9/5/2003		X			X						X	X	X							CPT: S.J. Yang CPT: Maxim Chen	CHU00030060-063	S.J. Yang	S.J. Yang, Dep. Vol. 2, 262-263
9/19/2003	email				X						X	X									MTPD-0183877	Bob O'Brien	Bob O'Brien dep. 343:24-346:15; 440:7-11
10/00/2003	Korea			X	X					X	X								X		SDCRT-0006510		
10/8/2003	n/a		X		X	X						X								MTPD: Muramatsu MTPD: Nakamoto MTPD: Iwamoto MTPD: Nishiyama	MTPD-0314102		
10/17/2003	n/a											X							X	MTPD: Tom Fote MTPD: Iwamoto THOM: Alex Hepburn	MTPD-0184084		
10/28/2003	TASHEE, Ming Garden Restaurant	X			X						X										CHU00660626	C.C. Liu	C.C. Liu, Dep. Vol. 3, 485-487
10/30/2003	Pittsburgh, PA					X				X									X	MEC: S. Iwamoto, Tom Fote THOM: Alex Hepburn LPD: Bob O'Brien	HEDUS-CRT00164095	Thom Schmitt	272:21 (Thom Schmitt)
10/31/2003	U.S.			X	X						X	X						X	X	MTPD: Alex Kinoshita	MTPD-0426066	Ayumu Kinoshita 30(6)(b)	397
10/31/2003	USA, San Diego: Matsushita Offices											X								MTPD: Kinoshita	MTPD-0426066	Kinoshita	Kinoshita II at 397-98
11/6/2003 - 11/9/2003	Irco offices in Xianyang					X									X					HIT: Satoshi Mutou HIT: Watanabe Mitsuru IRI: Takenaga	HDP-CRT00047354		
11/7/2003	Brussels, Belgium				X						X							X	X	THOM: Emeric Charamel SDI: Helmut Meinke SDI: Gabriel Kim Buckbee Mears Europe: Frank Sandtmann Ekranas: Michael Leipold SONY: Goro Sekiya Tesla Ecimex: Michal Mika Tesla Ecimex: Zdenek Stuchlik LPD: Leo Mink ANIE: Marcella Quattrocchi EECA EDIA: Anne-Marie Leclercq	SDCRT-0088629		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/11/2003	n/a			X		X					X	X						X	X		SDCRT-0005709		
11/12/2003		X			X	X					X	X	X							CPT: S.J. Yang CPT: Maxim Chen	CHU00030058-059	S.J. Yang	S.J. Yang, Dep. Vol. 2, 263-267
11/18/2003					X							X								MTPD: Kinoshita MTPD: Kinoshita, Alex SDI: Lee, Jaelin SDI: Kim: Woongrae SDI: Hur, Woo Suk	MTPD-0141811; SDCRT-0005645	Kinoshita	Kinoshita II at 218-28
11/21/2003	Netherlands		X		X						X								X	THOM: Emeric Charamel SDI: Gabriel LPD: MB	SDCRT-0088635		
11/28/2003					X						X	X								MTPD: Kinoshita SDI: Kim	MTPD-0038856	Kinoshita Nishimura	Kinoshita I at 88-99 Nishimura II at 191-96
12/1/2003					X							X								MTPD: Nishimura	MTPD-0426042		
12/4/2003	Paris, France		X		X						X	X						X	X		SDCRT-0088661		
12/4/2003					X						X	X							X	SDI: Dong Hoon Lee SDI: Lak Jin Kim LPD: Moon Bong Choi THOM: Emeric Charamel	SDCRT-0088661		
12/5/2003		X		X	X					X	X									CPT: C.C. Liu CPT: Tony Cheng CPT: Alex Yeh CPT: Yvonne Yuan	CHU00031214-220	C.C. Liu	C.C. Liu, Dep. Vol. 2, 275-276
12/6/2003	U.S.								X			X							X	MTPD: Shigkazu Shibata THOM: J. Hanrahan THOM: Christian Lissorgues	MTPD-0026563		
12/10/2003					X							X								Hun Sul Chu (SDI); Nishiyama (MTPD); Sanogawaya (MTPD)	SDCRT-0088431	HS Chu	
12/17/2003	email				X						X	X									MTPD-00140013	Bob O'Brien	Bob O'Brien Dep. Vol. 2,: 351:11-358:2; 440:19-441:24
12/17/2003	U.S.											X							X	MTPD: Shigkazu Shibata THOM: J. Hanrahan THOM: Christian Lissorgues THOM: Didier Trutt	MTPD-0043577		
12/18/2003	Shangri-La Hotel, Singapore	X			X															CPT: S.J. Yang CPT: Maxim Chen SDI: Mr. D.E. Lee	CHU00030064-065	S.J. Yang	S.J. Yang, Dep. Vol. 2, 267-271
Late 2003	Korea				X						X	X								MTPD: Nishimura, Kazutaka; Tanaka; Kawano		Kazutaka Nishimura	
2004		X			X						X									LPD: IH Han	n/a	Jim Kang Jung	70-71
2004		X			X															I.H. Song; Yvonne Yun		I.H. Song	245:4-19
2004		X			X						X									I.H. Song		I.H. Song	305:1-307:22
2004	LPD Taipei Office	X			X						X									Alex Yeh (CPT); Yvone Yun (CPT)	SDCRT-0090312	I.H. Song	315:12-317:11

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2004					X						X									I.H. Song; Cesar Jung (LPD)		I.H. Song	349:11-15
2004		X			X															I.H. Song	SDCRT-0096624E	I.H. Song	358:3-359:12
2004	U.S.																		X	THOM: Christian Lissorgues	MTPD-0014992; MTPD-0573840		
2004						X					X								X		HEDUS-CRT00164378	Tom Heiser	254:04 (Tom Heiser)
2004-2005	Yangmei Factory, Taiwan	X			X																		77:20-21
2004-2005					X						X												78:1-2
2004-2005	LPD Office	X			X						X												78:05:00
1Q 2004					X						X										SDCRT-0066803	KC Oh	
1/0/2004		X			X						X										CHU00660671	C.C. Liu	C.C. Liu, Dep. Vol. 3, 487-491
1/7/2004 - 1/10/2004	Various meetings and locations				X						X	X							X	Thom: Trutt, Thom: Lissorgues, Thom: J. Dumas. LPD: A. White, LPD: P. Canavan, LPD: A. Leunis, LPD: D. Ivey, LPD: R. Stafford, LPD: B. O'Brien, LPD: Q. Choi, LPD: R. Silva, LPD: H. Kashimura, LPD: W. Kim, LPD: P. Lee, SDI: J. Kim, SDI: D. Lee, SDI: K. Oh, SDI: C. Bae, SDI: C. Lee, SDI: K. Park. Orion: Yano, Itakura. TSB: Y. Kimura.	LPD-0000280	Bob O'Brien	Bob O'Brien Dep. Vol. 1,: 246:18-251:15
1/9/2004	Europe				X						X								X	LPD: Munbong Choi THOM: Emeric Charamel SDI: Junghwan Seo SDI: Lockjin Kim	SDCRT-0090077		
1/12/2004	email				X						X	X									MTPD-0027781	Bob O'Brien	Bob O'Brien Dep. Vol. 2,: 364:25-369:6; 442:19-443:2; 443:22-446:3
1/27/2004 to 1/30/2004	Xiamen, China "Fuzhou"	X		X	X		X				X									CPT: C.C. Liu CPT: Alex Yeh CPT: Yvonne Yuan	CHU00031227-231	C.C. Liu	C.C. Liu, Dep. Vol. 2, 276-277
2/7/2004					X							X								MTPD: Kinoshita	MTPD-0042034	Kinoshita	Kinoshita II at 302-08

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/16/2004		X			X						X	X	X							MTPD: Yasukawa MTPD: Tomor MTPD: Nishimura	MTPD-0423651	Nishimura	Nishimura II at 203-15 [See also Nishimura III at 345-54]
2/16/2004	Singapore	X			X						X	X	X							SDI: Lee, D.E.; Park, Kevin LPD: Jeon, B.K.; Park, Edmond CPT: Liu, C.C.; Yang, S.J.; Ming, Chen Shih Thai-CRT: Montri; Sirichai MTPD: Yasukawa; Tomori; Nishimura	MTPD-0423641	Kazutaka Nishimura	
2/16/2004	Singapore	X			X						X	X	X							SDI - Dae Eui Lee, Sung Duk Park LPD - Byung Goo Jeon, Joon Yong Park MTPD - Yasukawa, Tomori, Nishimura Chunghwa - C.C. Liu, Mr. Yang, Mr. Chen Thai CRT - Mr. Montri, Mr. Sirichai	SDCRT-0090157	Dae Eui Lee	282:6-285:13
2/16/2004 to 2/17/2004		X	X	X	X						X	X	X		X					CPT: C.C. Liu CPT: Tony Chen	CHU00030036-039	C.C. Liu	C.C. Liu, Dep. Vol. 2, 277-279
2/19/2004	email									X										LPD: P. Canavan; Panasonic: M. Kamoto	MTPD-0015858	Patrick Canavan	Patrick Canavan Dep. Vol. 2,, 380:6-381:6
2/23/2004	LPD Taipei Office	X			X						X										SDCRT-0090253	Hoon Choi	137:10
2/26/2004	Amsterdam, Netherlands				X						X								X	LPD: Felice Albertazzi LPD: Leo Mink THOM: Emeric Charamel SDI: Lockjin Kim	SDCRT-0090098		
3/1/2004	Novel, Shanghai	X																		CPT: S.J. Yang CPT: Maxim Chen CPT: Jeff Yue CPT: Tony Cheng CPT: C.C. Liu	CHU00030056	S.J. Yang	S.J. Yang, Dep. Vol. 3, 410-414
3/2/2004																					SDCRT-0090253	Hoon Choi	137:10; 145:9
3/2/2004		X			X						X										SDCRT-0090275	I.H. Song	248:1-250:20
3/3/2004	Shenzhen	X		X																CPT: S.J. Yang CPT: Maxim Chen Korea Orion: Mr. Kim	CHU00030051	S.J. Yang	S.J. Yang, Dep. Vol. 2, 271-274
3/12/2004	email				X						X	X									MTPD-0024653	Bob O'Brien	Bob O'Brien Dep. Vol. 2,: 362:11-364:13
3/15/2004		X			X						X										SDCRT-0090280	I.H. Song	255:4-24, 256:21-258:19
3/16/2004	Singapore	X			X						X	X	X								SDCRT-0090157		
3/16/2004	Singapore	X			X						X	X	X							SDI - Dae Eui Lee, Sung Duk Park LPD - Sung Dae Im, Joon Yong Park MTPD - Yasukawa, Nishimura Chunghwa - Mr. Yang, Mr. Chen Thai CRT - Mr. Montri	SDCRT-0090163	Dae Eui Lee	286:9-289:9
3/17/2004	Budapest NH Hotel Conference Room, Hungary				X						X								X	SDI: Lak Jin Kim SDI: Tae Ryong Park SDI: Dr. Glowik PH: Kris Mortier PH: Leo Mink THOM: Emeric Charamel	SDCRT-0090100 & SDCRT-0090100E; Samsung 2nd Supplemental Response p 69	Kris Mortier	Kris Mortier Dep. Vol. 2, 353-356, 537-550

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/21/2004	Singapore	X	X																X	CPT: S.J. Yang	CHU00030449-457	S.J. Yang	S.J. Yang, Dep. Vol. 2, 299-301
3/21/2004	Singapore	X			X						X	X							X	CPT: S.J. Yang	CHU00123358.1		
3/22/2004	phone call										X	X								MTPD: Tanaka	MTPD-0419572	Nishimura	Nishimura II at 217 on
3/22/2004	phone call				X							X								MTPD: Tanaka	MTPD-0419572	Nishimura	Nishimura II at 217 on
3/31/2004						X													X	HIT: Heiser, Wen, Guojun, Shibuya, Toyama, Komori, Schmitt, Sakamoto	HEDUS-CRT00184595	Noboru Toyama	108 (Noboru Toyama)
3/31/2004	Email					X				X										HIT: Heiser, Wen, Guojun, Shibuya, Toyama, Komori, Schmitt, Sakamoto	HEDUS-CRT00184595	Tom Heiser Noboru Toyama	273:24 (Tom Heiser); 230 (Noboru Toyama)
3/31/2004	Korea	X	X	X			X			X	X									CPT: C.C. Liu CPT: Tony Cheng CPT: Alex Yeh CPT: Yvonne Yun	CHU00031240-247	C.C. Liu	C.C. Liu, Dep. Vol. 2, 279-280
4/1/2004	San Diego				X							X								MTPD: Fujita, Norio; Yoshikawa; Usuta SDI: Oh, Patrick; Kim, Ray	MTPD-0027035	Fujita	Fujita II at 298
4/1/2004		X			X						X	X	X							MTPD: Ohmori MTPD: Tomori MTPD: Nishimura	MTPD-0576449	Nishimura	Nishimura II 221-25
4/6/2004-4/7/2004	Budapest				X						X									LPD: Oterloo LPD: Felice LPD: Kris SDI: D.S. Kim SDI: Meinke SDI: Rockow	SDCRT-00990102 & attachment	Kris Mortier	Kris Mortier Dep.Vol. 2, 374-391
4/20/2004	Delafoil - Perrysburg, OH					X					X								X	HIT: Tom Heiser, Tom Schmitt LPD: Pat Canavan, Bob O'Brien MTPD: Steve Lammers, Tom Fote, Steve Iwamoto THOM: Alex Hepburn	MTPD-0009514	Tom Heiser	222:21 (Tom Heiser)
4/23/2004	Thailand	X			X						X	X	X							CPT: Yan, S. J. (Assistant VP, Sales & Marketing, Taiwan); Ming, Chen Shih (Director, Malaysia) LPD: Kang, Il-Gyu (CPT Export Team, Korea); Park, Edmond (Marketing Asia Pacific, Korea) MTPD: Ohmori (Thailand); Tomori (Malaysia); Nishimura, K. (Takatsuki) SDI: Lee, D.E. (Sales, Malaysia); Park, Kevin (Marketing, Korea) T-CRT: Montri (Senior Manager, Sales, Thailand); Sirichai (Manager, Sales)	MTPD-0576449	Kazutaka Nishimura	
4/23/2004	Bangkok	X			X						X	X	X								SDCRT-0090163		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/23/2004	Bangkok	X			X						X	X	X							SDI - Dae Eui Lee, Sung Duk Park LPD - Joon Yong Park, Il Gyu Kang MTPD - Omori, Tomori, Nishimura Chunghwa - Mr. Yang, Mr. Chen Thai CRT - Mr. Montri	SDCRT-0090167	Dae Eui Lee	292:11-294:7
4/26/2004		X			X						X											I.H. Song	261:2-20
4/26/2004	SDI's San Diego Office				X							X								MTPD: Kawano; Tobinaga	MTPD-0637815	Tsuruta	Tsuruta II at 230-34
4/28/2004	LGE's Offices		X								X									LGE: Duk Chul Ryu LPD: PKAM Group	LGE00092293		
5/6/2004	SDI's San Diego office				X							X								MTPD: Yoshikawa, Masakazu; Fujita, Norio SDI: Kim, C.W.; Choi, H.W.; Lee, J.I.; Kim, R.	MTPD-0260906	Norio Fujita	Fujita II at 303
5/6/2004	LPD Taiwan Office	X			X						X										SDCRT-0090299	Hoon Choi	147:11
5/6/2004		X			X						X											Hoon Choi	369:9
5/12/2004					X						X	X									MTPD-0260262	Norio Fujita	
5/13/2004	Czech Republic				X						X							X	X	SDI: Helmut Meinke; LG Philips: Felice Albertazzi, LG Philips: Kris Mortier; Thomson: Emeric Charamel; Schott Glass: Stefan Georgi, Schott Glass: Peter Schreiner; Ekranas: Aydin Giz, Ekranas: Michael Leipold; Ecimex: Michael Minka; Sony: Goro Sekiya; BME: Frank Sandtmann; EECA EDIA: Leo Mink, and EECA EDIA: Anne-Marie Leclercq	Samsung 2nd Supplemental Response p 71	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
5/18/2004	Malaysia, Kuala Lumpur	X			X						X	X	X							SDI: Lee, D. E. (Sales, Malaysia), Park, Kevin (Marketing, Korea) LPD: Kang, Il-Gyu (CPT Export Team, LPD Korea), Park, Edmond (Marketing Asia Pacific, Korea) CPT: Yang, S. J. (Assistant VP, Sales & Marketing, Taiwan), Chen, Shih Ming (Director, Malaysia) T-CRT: Montri (Senior Manager, Sales, Thailand), Sirichai (Manager, Sales) MTPD: Yasukawa (Indonesia), Tomori (Malaysia), Nishimura K. (Takatsuki)	MTPD-0497049;CHU00030530	Yasuki Yamamoto; Kazuhiro Nishimaru; Kazutaka Nishimura	Yamamoto: 423:2-431:20; 433:24-435:18 Nishimaru: 417:24-442:18; Nishiyama II at 317-20, 323-30 Nishimara III at 417-27 Nishimura II at 226-236 Nishimura II at 318-36
5/18/2004		X			X						X	X	X							CPT: S.J. Yang	CHU00030530	S.J. Yang	S.J. Yang, Dep. Vol. 3, 355-357
5/18/2004		X			X						X	X	X								SDCRT-0090167		
5/18/2004	Malaysia	X			X						X	X	X							MTPD- Yasukawa, Nishimura, Tomori Chunghwa - Mr. Yang, Mr. Chen Thai CRT - Montri, Sirichai LPD - D. Park, D. Kang SDI - Sung Duk Park, Seung Min Lee, Dae Eui Lee	SDCRT-0090174	Dae Eui Lee	294:13-298:21

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
5/23-24/2004		X			X						X											Hoon Choi	147:11:00
5/23-24/2004		X	X		X					X											SDCRT-0090312	Hoon Choi	168:13:00
5/23-24/2004		X	X		X					X												Hoon Choi	168:13:00
5/23-24/2004		X			X						X										SDCRT-0090299	Hoon Choi	147:11:00
5/24-5/26/2004	Taiwan	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0089060	SK Park	
6/2/2004					X							X								MTPD: Nishimura, Kazutaka	MTPD-0236375	Shinichiro Tsuruta	244:13-248:2
6/14/2004	email									X	X									LPD: J. Son, LPD: P. Van Bommel, LPD: W. Vaartjes. PHS: J. Lombaerde	PHLP-CRT-001000	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 190:4-204:14
6/18/2004	Thailand	X			X						X	X	X							MTPD: Nishimura, Kazutaka; Yasukawa, Kazuteru	MTPD-0493549	Yasuki Yamamoto	404:6-422:20
6/18/2004	Thailand	X			X						X	X	X								MTPD-0493549	Kazutaka Nishimura	
6/18/2004		X			X						X	X	X							SDI - Dai Eui Lee, S.K. Park Chunghwa - Yang, Chen MTPD - Yasukawa, Nishimura Thai CRT - Montri LPD - Sung Dae Im, D. Park, Joon Yong	SDCRT-0090180	Dae Eui Lee	299:2-301:13
6/18/2004	Thailand	X			X						X	X	X								MTPD-0493549;	Yamamoto Sanogawayaya Nishimura	Yamamoto III at 404-12 Sanogawayaya II at 303-05 Nishimura II at 238-45
6/24/2004	Thailand	X			X						X	X	X								SDCRT-0090174		
6/28/2004						X													X		HEDUS-CRT00164492	Tom Heiser	297:23 (Tom Heiser)
After June 2004		X			X						X	X	X							MTPD: Yamamoto; Yasuki		Yasuki Yamamoto	358:5-362:1; 420:1-421:1
After June 2004		X			X						X	X	X							MTPD: Yamamoto; Yasuki		Yasuki Yamamoto	358:5-362:1
7/2/2004		X																		CPT: Alex Yeh	CHU00031254	C.C. Liu	C.C. Liu, Dep. Vol. 2, 377-379
7/5/2004		X		X	X	X					X				X			X	X		MTPD-0580871		



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/7/2004	Email				X						X										PHLP-CRT-011458	Kris Mortier	Kris Mortier Dep.Vol. 2, 422-424
7/14/2004	email										X								X		PHLP-CRT-012615	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 215:6-218:5
7/16/2004		X																	X	CPT: C.C. Liu CPT: Hsiang-Kwei Chung CPT: Sheng-Jen Yang	CHU00030040		
7/22/2004	Singapore Conrad Hotel	X	X		X					X		X	X							CPT: Chen, Shih-Ming (Maxim): Yang, S.J. LPD: Lim, S.D.: Park, Edmond MTPD: Yasukawa, K. SDI: Jaya T-CRT: Montri; Shiriachai	MTPD-0486918	Kazuhiro Nishimaru	484:1-491:21
7/22/2004	Singapore: Hotel Conrad	X			X						X	X	X							MTPD: Tomori MTPD: K. Yasukawa SDI: Mr. Jaya LPD:Mr. S.D. Lim, Mr. Edmond Park CPT: Shih-Ming (Maxim) Chen, Mr. S.J. Yang TCRT: Mr. Montori, Mr. Shiriachai	SDCRT-0090180; MTPD-0486917; MTPD-0485511	Nishiyama	Nishiyama III at 419-26
7/26/2004 to 7/27/2004	Renaissance Hotel	X			X						X										CHU00660709	C.C. Liu	C.C. Liu, Dep. Vol. 3, 491-492
7/26-7/27/2004	China	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0089076	SK Park	
7/26/2004		X			X					X	X									CPT: VP C.C. Liu CPT: VP Chung	CHU00031262-267	C.C. Liu	C.C. Liu, Dep. Vol. 2, 280-281 Dep. Vol. 2, 379-382
7/28/2004		X			X					X											SDCRT-0090319; SDCRT-0090233	SK Park	
8/4/2004	email				X						X										PHLT-CRT-014085	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 218:10-225:11; 232:13-235:9
8/13/2004	email				X						X										MTPD-0483335 & MTPD-0483335E_Translation	Patrick Canavan	Patrick Canavan Dep. Vol. 2, 407:23-411:15
8/13/2004 and 8/16/2004	CPT	X			X						X									CPT: C.C. Liu CPT: Yvonne Yun CPT: Alex Yeh	CHU00031268-269	C.C. Liu	C.C. Liu, Dep. Vol. 2, 281-283
8/17/2004	Japan	X			X						X									CPT: C.C. Liu	CHU00660717-727	C.C. Liu	C.C. Liu, Dep. Vol. 2, 285-288
8/17/2004			X									X								LG: P.J. Lee LG: Ian Song MTPD: Kazuhiro Nishimaru	MTPD-0613379	Pil Jae Lee	217
8/17/2004	MTPD Thailand										X	X								LPD: Lee, Phil J.: Song, Ian MTPD: Ohmori (SM); Nishimaru	MTPD-0490549	Kazuhiro Nishimaru	280:1-291:7
8/17/2004 to 8/18/2004		X			X						X										CHU00660717	C.C. Liu	C.C. Liu, Dep. Vol. 3, 492-496
8/17/2004 to 8/18/2004	Japan	X			X						X									CPT: C.C. Liu CPT: Alex Yeh	CHU00031272-273	C.C. Liu	C.C. Liu, Dep. Vol. 2, 283-285

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/17-8/18/2004	Japan	X			X					X										Sang Kyu Park (SDI)	SDCRT-0089091; SDCRT-0090328	SK Park	
8/17/2004	MTPD Offices										X	X								LPD: Mr. Phil J. Lee; Mr. Ian Song MTPD: Ohmori SM, Nishimaru	MTPD0490551	Nishimaru	Nishimaru II at 288-91
8/18/2004												X									MTPD-0490549	Nishimaru	Nishimaru II at 279-87
8/20/2004	Belgium				X						X							X	X	SDI: Helmut Meinke; LG Philips: Felice Albertazzi, LG Philips: Kris Mortier; Thomson: Emeric Charamel; Schott Glass: Stefan Georgi, Schott Glass: Peter Schreiner; Ekranas: Aydin Giz, Ekranas: Michael Leipold; Tesla Ecimex: Michal Mika, Tesla Ecimex: Zdenek Stuchlich; Sony: Goro Sekiya; BME: Michael Sillmann; EECA EDIA: Leo Mink, and EECA EDIA: Anne-Marie Leclercq	Samsung 2nd Supplemental Response p 73	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
8/30/2004	Email										X										PHLP-CRT-015346	Kris Mortier	Kris Mortier Dep.Vol. 1, 259-265
8/30/2004	email							X			X									MIT: R. Haarst (CRT Mkt Mgr) LPD: K. Lam	PHLP-CRT-015923	Wiebo Jan Vaartjes; Kris Mortier	Wiebo Jan Vaartjes Dep. 225:20-232:10; Kris Mortier Dep.Vol. 2, 502-506
9/0/2004		X			X						X										CHU00660729	C.C. Liu	C.C. Liu, Dep. Vol. 3, 496-497
9/3/2004						X						X								MTPD: Ohmori SM; Nishimaru	MTPD-0267083	Fujita	Fujita II at 320
9/3/2004					X							X								MTPD: Fujita, Norio SDI: Kim, Ray	MTPD-0267083	Shinichiro Tsuruta; Norio Fujita	Tsuruta: 415:8-420:2
9/4/2004	email	X	X	X	X	X		X	X			X						X	X		PHLP-CRT-091458	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 227:17-233:21
9/9/2004					X						X	X							X		PHLP-CRT-017120 & attachment PHLP-CRT-017121	Kris Mortier	Kris Mortier Dep.Vol. 2, 464-472
9/13/2004					X						X	X									MTPD-0483334	Nishimura	Nishimura II at 247-51

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/23/2004	Korea	X	X		X						X									CPT: Yvonne Yun CPT: AVP Jin-Yao Yang CPT: Alex Yeh	CHU00031274-277	C.C. Liu	C.C. Liu, Dep. Vol. 2, 288-290
9/24/2004		X										X								MTPD: Kazutaka Nishimura CPT: Maxim Chen	MTPD-0492286	Yasuki Yamamoto; Kazuhiro Nishimaru; Kazutaka Nishimura	Yamamoto: 182:17-195:20 Nishimaru: 292:1-299:21
9/27/2004		X										X								MTPD: Nishimura	MTPD-0492286	Kinoshita, Nishiyama, Nishimura	Kinoshita II at 389-91, Nishiyama II at 364-66; Nishimaru II at 252, 292-302
10/1/2004					X							X								MTPD: Fujita, Norio SDI: Kim, Ray	MTPD-0230970	Shinichiro Tsuruta; Norio Fujita	Fujita II at 322-23; Tsuruta: 420:5-424:5
10/4/2004	Email	X		X	X						X	X						X	X		PHLP-CRT-019008	Kris Mortier	Kris Mortier Dep.Vol. 2, 449-458
10/18/2004	Email				X						X										PHLP-CRT-020159 & Attachment PHLP-CRT-02016	Kris Mortier	Kris Mortier Dep.Vol. 2, 391-397
10/19/2004	Email				X						X								X		PHLP-CRT-019930 & Attachments (PHLP-CRT-19933; -19934; -19935; -19936; -19937; -19938; -19939; -19940; -19941; -19942)	Kris Mortier	Kris Mortier Dep.Vol. 1, 224-247
10/27/2004	email										X	X							X		PHLP-CRT-021673	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 235:13-242:18
11/2/2004		X	X		X															CPT: AVP J.S. Lu CPT: Mei Da-Peng SDI: Mr. Jae In Lee	CHU00033227-228	J.S. Lu	J.S. Lu, Dep. Vol. 2, 167-170
11/3/2004	Paris, France				X					X									X	LPD: MB Choi LPD: PJ Lee THOM: Christian Lissorgues SDI: DH Lee	PHLP-CRT-022741		
11/4/2004	LPD Taipei Office	X			X						X										SDCRT-0090350	Hoon Choi	214:11
11/5/2004											X									Joon Suk Kim CPT: Jim Kang Jung	CHU00646035	Jim Kang Jung	113

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
11/5/2004	Telephone / MTPD's Ohio factory					X						X								HIT: Kawamura MTPD: Totoku	HEDUS-CRT00028552	Noboru Toyama	178 (Noboru Toyama)
11/9/2004	Email			X	X						X								X		PHLP-CRT-024274 & Attachments (PHLP-CRT0436734)	Kris Mortier	Kris Mortier Dep.Vol. 1, 265-268
11/11/2004		X			X															SDI: Hoon Choi	CHU00645177	Jim Kang Jung	122
11/15/2004	Taiwan: Taipei, LPD offices	X			X						X	X		X						CPT: Ling Yuan Yun CPT: Sheng Bo Yang LPD: Qingxie Han LPD: Zhenkang Zheng SDI: Yinhuan Song SDI: Xun Cui	CHU00578883	Jim Kang Jung	134
11/15/2004		X			X						X										n/a	Jim Kang Jung	133
11/15/2004		X			X						X									LPD: Gyeong Seop Han LPD: Jin Gan Jeong CPT: Yvone Yun SDI: Hwan Song SDI: Hoon Choi	SDCRT0090350	Jim Kang Jung	142
11/15/2004		X			X						X											Hoon Choi	214:11
11/15/2004	LPD Taipei Office	X			X						X									Gyeong Seop Han (LPD Branch Manager); Jin Gang Jeong (LPD Section Chief); Yvone Yun (CPT); Hwan Song (SDI Branch Manager); Hun Choi (SDI Section Chief)	SDCRT-0090350E	I.H. Song	350:14-351:15
11/16/2004		X			X						X									SDI: Hoon Choi SDI: Sam Song LPD: Kenny Han CPT: Mr. Yang	CHU00645156	Jim Kang Jung	149
11/19/2004	email				X						X								X		PHLP-CRT-023513	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 286:8-293:2
11/19/2004	Amsterdam, Netherlands				X						X								X	SDI: Lockjin Kim THOM: Emeric Charamel	SDCRT-0090144		
11/24/2004		X			X						X									SDI: Hoon Choi SDI: Sam Song LPD: Kenny Han CPT: Mr. Yang	CHU00644987 CHU00644988	Jim Kang Jung	152
11/24/2004		X			X						X											Hoon Choi	221:23
12/1/2004	email									X	X										PHLP-CRT-024736	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 113:11-121:6
12/2/2004		X	X																	LG: Jim Kang Jung CPT: Yang Sheng-po	CHU00638344	Jim Kang Jung	167

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/2/2004					X						X	X									MTPD-0455847; MTPD-0521744	Shinichiro Tsuruta	109:12-115:6
12/6/2004	Korea	X			X					X	X									CPT: Director Alex Yeh CPT: Yvonne Yun	CHU00031279-282	C.C. Liu	C.C. Liu, Dep. Vol. 2, 290-291
12/6/2004		X			X						X									LG: Jim Kang Jung SDI: Hoon Choi	CHU00651590	Jim Kang Jung	94
12/6/2004	Email			X	X						X							X	X		PHLP-CRT-024999	Kris Mortier	Kris Mortier Dep.Vol. 1, 256-259
12/6/2004	Takatsuki																			LPD: W. Vaartjes, LPD: K. Kortekaas, LPD: K. Mortier, LPD: N. Corsino, LPD: W. Brouwer, LPD: M. Smits, LPD: H. Kashimura. Unknown: D. Engelsen.	PHLP-CRT-027718	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 242:22-249:24
12/21/2004	email										X	X									PHLP-CRT-027715	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 2, 449:5-457:1
12/28/2004		X			X						X										CHU00649654	Jim Kang Jung	Jung, 170
12/28/2004	Singapore	X			X						X	X	X							MTPD: Nishimura CPT: Shih-Ming (Maxim) Chen; Sheng-Jen (S.J)	MTPD-0479660 - MTPD-0479661	Kazutaka Nishimura	Nishimura II at 252-56
12/28/2004																							
12/29/2004		X									X									SDI - SK Sung	SDCRT-0066803		
2005		X			X						X									LPD: Jim Kang Jung CPT: KS Han	n/a	Jim Kang Jung	70-71
2005	Seoul, South Korea				X						X	X								MTPD: Tsuruta, Shinichiro; Nishimaru, Kazuhiro		Shinichiro Tsuruta	25:2-37:19; 43:3-52:14
2005	Takatsuki, Japan				X						X	X								MTPD: Tsuruta, Shinichiro		Shinichiro Tsuruta	25:2-37:19; 42:1-12
2005					X						X	X								MTPD: Tsuruta, Shinichiro		Shinichiro Tsuruta	25:2-37:19
2005					X						X	X								MTPD: Tsuruta, Shinichiro		Shinichiro Tsuruta	25:2-37:19
2005	Email				X						X								X		PHLP-CRT-009416	Kris Mortier	Kris Mortier Dep.Vol. 2, 506-510

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
1/7/2005	Los Angeles				X						X									LPD: W. Vaartjes, LPD: N. Corsino, LPD: K. Nam Je, LPD: C. Gyu.	SDCRT 0007539E	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 263:12-283:18
1/7/2005					X					X										Wiebo Vaartjes (LPD); Ney Corsino (LPD); Nam Je Ko (LPD); Gyu In Choi (LPD); Jae Shik Kim (SDI); Yeo Chang Yoon (SDI)	SDCRT-0007547	SK Park	
1/10/2005		X			X						X									LG: Jim Kang Jung CPT: Mr. Yang SDI: Hoon Choi	CHU00637563 CHU00637566	Jim Kang Jung	216
1/12/2005	Email				X						X								X		PHLP-CRT-023189	Kris Mortier	Kris Mortier Dep.Vol. 2, 439-442
1/19/2005	Taiwan: Taipei	X			X						X									CPT: Mr. Yang CPT: Alex Yeh CPT: Yvonne Yun CPT: Sam Yang LPD: Simon Lee LPD: Kenny Han LPD: J.S. Kim SDI: SK Park SDI: Sam Song SDI: JH Choi	CHU00648816 CHU00648817 CHU00648818	Jim Kang Jung	207
1/19/2005		X			X						X									CPT: S.P. Yang CPT: JJ Yeh CPT: LY Yun LPD: JK Jung LPD: Kenny Han SDI: Hoon Choi SDI: Sam Song	CHU00648741	Jim Kang Jung	232
1/20/2005				X	X						X								X	SDI: L.J. (Gabriel) Kim Thom: E. Charamel LPD: M.B. Choi	PHLP-CRT-023135	Kris Mortier	Kris Mortier Dep.Vol. 2, 442-449
1/20/2005	email				X						X								X		PHLP-CRT-023137	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 254:23-257:7
1/27/2005						X							X							HIT: Ryouji Hirai, MTPD: Muramatsu	HDP-CRT00033831	Noboru Toyama	170 (Noboru Toyama)
1/28/2005	n/a										X								X	THOM: Christian Lissorgues PHS: Rik Dombrecht PHS: Jan De Lombaerde	PHLP-CRT069798; PHLP-CRT069800		
2/2/2005					X							X								MTPD: Yoshikawa; Fujita SDI: Jin, Sean; Kim, Ray	MTPD-0235157	Norio Fujita	

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/2/2005	San Diego				X							X								MTPD: Yoshikawa, Masakazu	SDI 2nd Supp Interrogatory Responses		
2/2/2005	San Diego				X							X								MTPD: Fujita SDI: Kim, Ray	MTPD-0235157	Fujita	Fujita II at 326-27
2/2/2005	email										X										LPD-NL00249890	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 293:3-301:7
2/4/2005					X						X	X								MTPD: Nishimura, Kazutaka	MTPD-0258403	Norio Fujita	
2/16/2005		X			X						X									CPT: SP Yang CPT: JJ Yeh LPD: JK Jung SDI: Hoon Choi	CHU00735251 CHU00735253	Jim Kang Jung	195
2/16/2005	Belgium				X						X								X	SDI: Helmut Meinke, SDI: Gabriel Kim; Thomson: Emeric Charamel; Schott: Stefan Georgi; Ekranas: Michael Leipold; Tesla Ecimax: Michael Minka, Tesla Ecimax: Zdenel Stuchlich; BME: Michael Stillmann; LG Philips: Kris Mortier; Wickeder: Bruno Streb; EECA EDIA: Leo Mink, and EECA EDIA: Anne-Marie Leclercq	Samsung 2nd Supplemental Response p 77	Kris Mortier	Kris Mortier Dep.Vol. 2, 537-550
2/18/2005	Hong Kong										X								X	PHS: A. Huijsers, PHS: Y.S. Kwon, PHS: Y.B. Na, PHS: H. Bolhaar, PHS: M. McHugh. LPD: J.I. Son, LPD: P. Van Bommel, LPD: W. Vaartjes and LPD: D.S. Moon.	LPD-NL00228337	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 82:5-94:8
2/22/2005-2/25/2005	Malaysia	X			X					X										Sang Kyu Park (SDI)	SDCRT-0091742	SK Park	
2/24/2005	Palm Garden Golf Club, Marriott Hotel, Goongjun	X			X						X										CHU00647932-940	C.C. Liu	C.C. Liu, Dep. Vol. 3, 497-500
2/25/2005-2/26/2005					X						X	X									CHU00030499 & CHU00030499.01E	Patrick Canavan	Patrick Canavan Dep. Vol. 1, 340:25-346:18

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/25/2005		X			X						X	X	X							MTPD - Yasukawa, Tmori, Ohmori Chunghwa - Yang, Chen Thai CRT - Montri, Sirichai LPD - K Lim SDI - Dae Eui Lee, S.K. Park	SDCRT-0091351	Dae Eui Lee	299:22-304:1
3/2/2005	Malaysia	X			X						X									CPT: VP C.C. Liu CPT: Yvonne Yuan	CHU00608095-105	C.C. Liu	C.C. Liu, Dep. Vol. 2, 291-292
3/7/2005	Email										X										PHLP-CRT-031189	Kris Mortier	Kris Mortier Dep.Vol. 2, 589-598
3/15/2005				X	X						X	X							X		SDCRT-0002998		
3/17/2005	Email										X								X		PHLP-CRT-031643 & Attachment PHLP-CRT-031644	Kris Mortier	Kris Mortier Dep.Vol. 2, 472-477
3/22/2005	Amsterdam, Netherlands				X						X								X		SDCRT-0002984		
3/29/2005		X			X						X										SDCRT-0091616; ESDCRT-0091616	I.H. Song; Choi	Song: 647, 647E; 359:14-18, 360:3-361:3; Choi: 369:20
3/29/2005 - 3/30/2005	Taiwan: Taoyuan, Chinatrust Landmark Hotel	X			X						X									CPT: Ling-Yuan Yun CPT: Ling-Yun Cheng CPT: Chih-Chun Liu CPT: Mr. Chiu LPD: Cesar Jung SDI: Hoon Choi	CHU00363404	Jim Kang Jung	221
3/29-30/2005		X			X						X										SDCRT-0091616	Hoon Choi	252:25:00
4/00/2005					X						X									Seong Shik Kim (SDI);	SDCRT-0006868	KC Oh	
4/5/2005	Email				X						X								X		PHLP-CRT-027540	Kris Mortier	Kris Mortier Dep.Vol. 2, 424-428
4/11/2005					X							X								Hun Sul Chu (SDI); Yamamoto (MTPD)	SDCRT-0007257	HS Chu	
4/12/2005																					SDCRT-0091628	Hoon Choi	259:19
4/21/2005					X						X										PHLP-CRT-028048	Kris Mortier	Kris Mortier Dep.Vol. 2, atpp. 477-484
4/29/2005	Indonesia	X			X						X	X	X							Sung Dae Im (LPD); Joon Yong Park (LPD); Yasukawa (MTPD); Nishimura (MTPD); Yang (CPT); Chen (CPT); Montri (Thai CRT); Shirichai (Thai CRT); Dae Oi Lee (SDI); Sung Duk Park (SDI)	SDCRT-0091364	KC Oh	



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
4/29/2005 to 4/30/2005		X									X	X	X							CPT: S.J. Yang	CHU00030495	S.J. Yang	S.J. Yang, Dep. Vol. 3, 357-359
5/00/2005	Korea				X						X	X								MTPD: Nishimaru, Kazuhiro SDI: Park, Kevin LPD: Park, Edmond		Kazuhiro Nishimaru	101:23-109:23
5/6/2005	Email				X						X								X		PHLP-CRT-033503 & Attachment	Kris Mortier	Kris Mortier Dep.Vol. 1, 285-289
5/12/2005	Email				X						X	X						X	X		PHLP-CRT-10067	Kris Mortier	Kris Mortier Dep.Vol. 1, 276-285
5/25/2005		X			X						X										SDCRT-009 1643	SK Park	
5/26/2005						X						X								MTPD: Iwamota, Murumatsa	MTPD-0479804	Murumatsa	Murumatsa at
5/30/2005		X			X						X									CPT: J.S. Lu	CHU00607732-735	J.S. Lu	J.S. Lu, Dep. Vol. 2, 219-221
5/31/2005	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray	MTPD-0479837	Shinichiro Tsuruta; Norio Fujita	Tsuruta: 208:7-221:2; Fujita II at 336-38
6/3/2005						X														HIT: Isao Yoshimi	HDP-CRT00034133		
6/9/2005	Malaysia	X			X						X	X	X							MTPD: Yamamoto, Yasuki	MTPD-0517734	Yamamoto	Yamamoto III at 367-77
6/9/2005	Malaysia	X			X						X	X	X								MTPD-0517734	Yasuki Yamamoto; Shinichiro Tsuruta	Yamamoto: 367:10-377:22 Tsuruta: 406:18-409:1
6/9/2005		X			X						X	X	X							SDI - S.K. Park, Dae Eui Lee MTPD - Yasukawa, Tommori, Nishimura, Yamamoto Thai CRT - Montri LPD - Edmond Park Chunghwa - Yang Chen, Jimmy Chen	SDCRT-0091377	Dae Eui Lee	304:16-307:5
6/9/2005-6/10/2005	Kuala Lumpur																			MTPD: Yasukawa; Tomori; Nishimura; Yamamoto SDI: Lee, D.E.; Park, Kevin LPD: Lim; Park, Edmond CPT: Yang, S.J.; Chen, S.M. Thai-CRT: Damri; Kanet; Montri; Sirichai; Pangsun	MTPD-0517540	Yasuki Yamamoto	362:9-367:8
6/13/2005		X			X						X									CPT: S.P. Yang CPT: JJ Yeh CPT: LY Yun LPD: J.K. Jung LPD: Kenny Han SDI: Hoon Choi	CHU00646730 CHU00646732	Jim Kang Jung	224
6/13/2005	Email										X										PNV0007136 & Attachment PNV0007138	Kris Mortier	Kris Mortier Dep.Vol. 1, 300-306

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/13/2005					X						X							X	X	EECA: Anne-Marie Leclercq EDIA: Leo Mink LPD: Felice Albertazzi THOM: Emeric Charamel Sony: Goro Sekiya Sony: Tetsuro Shibasaki SDI: Helmut Meinke	PHLP-CRT-037126 & Attachments	Kris Mortier	Kris Mortier Dep.Vol. 2, 428-433
6/17/2005	Email										X										PHLP-CRT-029020	Kris Mortier	Kris Mortier Dep.Vol. 1, 292-300
6/19/2005	email																			LPD: J. Son and LPD: LPD Team PHS: M. McHugh and PHS: PCE team.	PHLP-CRT-064261	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 183:1-189:24
6/20/2005	China					X													X	HIT: Tom Heiser HIT: Hirai Ryouji HIT: Yang Ziming Meachael Bougia	HEDUS-CRT00161054		
6/21/2005	Taiwan	X	X	X	X					X										J.Y. Youn		J.Y. Youn	51:18
6/22/2005	Email				X						X										PHLP-CRT-06200 & attachment PHLP-CRT-036202	Kris Mortier	Kris Mortier Dep.Vol. 2, 397-
6/22/2005	Taiwan	X	X	X	X					X										J.Y. Youn		J.Y. Youn	51:22
6/23/2005	email				X						X								X		PHLP-CRT-038073	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 2, 448:20-492:11
6/23/2005		X	X	X	X					X			X								CHU00660383	C.C. Liu	C.C. Liu, Dep. Vol. 3, 461-465
6/27/2005		X		X						X											CHU00125895	J.S. Lu	J.S. Lu, Dep. Vol. 2, 216-217
6/27/2005		X																		J.S. Lu	CHU00125849-858	J.S. Lu	
6/28/2005	Taiwan	X			X						X									I.H. Song; SK Park		I.H. Song	368:13-369:13
6/29/2005	Email				X						X	X						X	X		PHLP-CRT-035894 & PPT Attachment	Kris Mortier	Kris Mortier Dep.Vol. 1, 306-318

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/30/2005					X						X	X								MTPD: Yamamoto	MTPD-0479738; MTPD-0479739	Yamamoto	Yamamoto III at 377-91
7/1/2005		X		X	X	X	X	X			X		X					X	X		CHU00125257		
7/4/2005		X			X						X										SDCRT-0091656E	I.H. Song	367:3-24
7/4/2005	n/a									X								X	X	PHS: Rik Dombrecht PHS: Jan De Lombaerde	PHLP-CRT-062325; PHLP-CRT-062493		
7/11/2005	Amsterdam		X								X									PHS: A. Huijser, PHS: Y.S. Kwon, PHS: M. McHugh, PHS: Y.B. Na and PHS: H. Olde Bolhaar. LPD: J.I. Son, LPD: P. vanBommel, LPD: W. Vaartjes, LPD: S.D. Han and LPD: D.S. Moon.	LPD-NL00263838	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 94:14-100:14
7/12/2005					X						X										LPD NL00214835	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 301:9-306:5
7/19/2005											X	X								MTPD: Tsuruta, Shinichiro LPD: Kang	MTPD-0403729	Shinichiro Tsuruta	431:12-436:3
7/22/2005		X			X						X										SDCRT-0091668	I.H. Song	364:20-367:1
8/00/2005	Thailand				X						X	X								MTPD: Nishimaru, Kazuhiro; Yamamoto, Yasuki SDI: Park, Kevin LPD: Park, Edmond		Kazuhiro Nishimaru	101:23-102:3; 137:1-143:5
8/00/2005	Bangkok, Thailand	X			X						X	X	X							MTPD: Nishimaru, Kazuhiro; Yamamoto, Yasuki; Tomori, Yasukawa Thai-CRT: Montri LPD: Park, Edmond SDI: Park, Kevin		Kazuhiro Nishimaru	145:15-148:24; 213:6-215:20
8/1/2005	Thailand	X			X						X	X	X							MTPD: Nishimaru	MTPD-0400553	Nishimaru	Nishimaru II at 332-37

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
8/3/2005	n/a										X								X	LPD: Felice Albertazzi LPD: MB Choi THOM: Christian Lissorgues	PHLP-CRT-037654; PHLP-CRT-037940		
8/5/2005		X			X						X	X	X								MTPD-0400553	Kazuhiro Nishimaru	332:9-341:4
8/18/2005	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray	MTPD-0303225	Shinichiro Tsuruta; Norio Fujita	Tsuruta: 235:15-244:9
8/18/2005	phone call				X							X								MTPD: Fujita; SDI: Kim, Ray	MTPD-0303225	Fujita, Tsuruta	Fujita III at 353-55, Tsuruta II at 235-39
8/19/2005		X			X						X	X	X								MTPD-0518803		
8/31/2005	email				X						X										PHLP-CRT-007921	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 308:12-313:15
9/00/2005		X			X					X											SDCRT-0091687	J.I. Lee	
9/3/2005					X						X										SDCRT-0007609	KC Oh	
9/3/2005	China				X						X									SDI - SK Sung; LPD - Yang	SDI rog responses	SK Sung	148:4-149:15
9/5/2005		X			X						X	X	X							Thai-CRT: Mahaplerkpong, Montri; Rujirat, M., K. Pongsun, Sirichai, S. MTPD: Yamamoto, Yasuki; Nishimaru, Kazuhiro; Nishimura, Kazutaka; Omori, Masaru; Tomori, Yasuaki CPT: Yang, S.J. LPD: Lim S.D.; Edmond SDI: Lee, D.E.; Park, Kevin	MTPD-0622464	Kazuhiro Nishimaru	314:24-318:7
9/9/2005	email				X						X										PHLP-CRT-008353	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 2, 405:1-410:15
9/20/2005	U.S.				X														X	SDI: K.C. Oh THOM: Alonso Pando THOM: Li Yuguo THOM: ES Shuy THOM: Michael Bourgerie	SDCRT-0016638		
9/21/2005	email				X						X										PHLP-CRT-010256	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. 127:16-152:1; 284:25-291:2

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
9/22/2005	Jakarta	X			X						X	X	X							MTPD: Yasakawa, Chen, Hwang-Yun (Henry) TCRT: Chen, Mu-Lin (Jimmy)	MTPD-0479726		
9/28/2005 - 9/29/2005		X			X						X									CPT: LY Yun CPT: JS Kim LPD: Simon Lee LPD: JK Jung LPD: Kenny Han SDI: John Ha	CHU00014223	Jim Kang Jung	241
9/29/2005					X						X	X								MTPD: Tanaka	MTPD-0479721	Nishiyama	Nishiyama II at 291-300
9/29/2005	email				X						X										PHLP-CRT-038897	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 313:16-316:10
10/21/2005	Taiwan	X			X						X	X	X								MTPD-0479728	Kazuhiro Nishimaru	318:12-326:6
10/21/2005	Taiwan	X			X						X	X	X							MTPD: Nishiyama, Nishimaru MTPD: Mr. Yasukawa MTPD: Mr. Tomori MTPD: Mr. Nishimura MTPD: Mr. Yamamoto MTPD: Mr. Omori SDI: Mr. D.E. Lee SDI: Mr. Kevin Park LG: Mr. Lim LG: Mr. Edmond Park LG: Mr. Ian Song CPT: Mr. S.J. Yang CPT: Mr. Jimmy Chen T-CRT: Mr. Montri T-CRT: Mr. Sirichai T-CRT: Mr. Pongsun	MTPD-0479728	Nishiyama, Nishimaru	Nishiyama II at 367-69, Nishimaru II at 318-26
10/25/2005	email				X						X										PHLP-CRT-039666	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 2, 501:9-505:2
11/00/2005					X						X	X								MTPD: Nishimaru, Kazuhiro SDI: Park, Kevin LPD: Park, Edmond		Kazuhiro Nishimaru	101:23-102:3; 216:8-235:13
11/1/2005	LPD				X						X	X								MTPD: Nishimaru		Nishimaru	Nishimaru II at 216-31
11/2/2005	Taipei	X			X						X									CPT: J.S. Lu CPT: Lin LPD-Taipei President Han SDI-Taipei President Song	CHU00014218	J.S. Lu	J.S. Lu, Dep. Vol. 2, 206-209
11/21/2005		X	X		X						X	X								CPT: J.S. Lu SDI: Mr. S.K. Park SDI: Mr. Sam Song LPD: Mr. S.K. Lee LPD: Mr. Hang	CHU00014227-229	J.S. Lu	J.S. Lu, Dep. Vol. 2, 242-247
11/30/2005	U.S. (California)				X							X								MTPD: Fujita, Norio SDI: Kim, Ray	MTPD-0291761	Yasuki Yamamoto; Norio Fujita	Yamamoto: 478:6-481:19
12/1/2005					X						X	X								MTPD: Tsuruta, Shinichiro	MTPD-0297131	Norio Fujita	
12/2/2005					X							X								MTPD: Fujita, Shibata SDI: Kim, Ray	MTPD-0291761	Yamamoto, Fujita	Yamamoto III at 478-81, Fujita III at 359-63

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
12/12/2005	Korea				X						X	X							X	MTPD: Yamamoto, Yasuki; Kawano, Tomoyuki; Tanaka, Yasuo	MTPD-0410018; MTPD-0410020	Yasuki Yamamoto	392:16-404:5, 392, 399
12/14/2005	email				X						X										PHLP-CRT-005669	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 316:12-312:20
12/15/2005	Korea				X						X	X								MTPD: Yamamoto, Tsuruta, Fujita	MTPD-0410018; MTPD-0410020; MTPD-0521744; TSB-CRT-00041620	Yamamoto, Fujita	Yamamoto III at 392-404, Fujita III at 364-70
12/20/2005	Taoyuan	X			X						X									CPT: J.S. Lu	CHU00014232	J.S. Lu	J.S. Lu, Dep. Vol. 2, 217-219
12/20/2005-12/23/2005	Taiwan	X	X	X	X					X										Sang Kyu Park (SDI)	SDCRT-0091852	SK Park	
Late 2005		X	X		X															Jae In Lee (SDI)	SDC RT-009 1692	J.I. Lee	
3/00/2006	Singapore				X						X	X								MTPD: Nishimaru, Kazuhiro LPD: Park, Edmond		Kazuhiro Nishimaru	101:23-102:3; 243:9-247:7
3/00/2006	Singapore	X			X						X	X	X							MTPD: Nishimaru, Kazuhiro; Tomori; Yasukawa Thai-CRT: Montri		Kazuhiro Nishimaru	238:11-243:8
3/1/2006					X						X	X								MTPD: Nishimaru		Nishimaru	Nishimaru II at 243-48
3/1/2006					X							X									MTPD-0504767; MTPD-0504768	Tobinaga, Kinoshita	Tobinaga I at 100-01, Kinoshita I at 169-81
3/9/2006	Singapore Marriott	X			X						X	X	X							CPT: Yang, Jimmy LPD: Lim, S.D. SDI: Jaya Thai-CRT: Montri MTPD: Yasukawa; Nishimaru; Tomori	MTPD-0479732; CHU00030458	Shinichiro Tsuruta	276:4-297:21
3/10/2006	Singapore	X			X						X	X	X							MTPD: Nishimaru,Yakazowa	MTPD-0400555	Nishiyama, Nishimaru	Nishiyama III at 452-58, Nishimaru II at 239-43
3/13/2006		X			X						X										SDCRT-0091715E	I.H. Song	362:19-364:9
3/14/2006					X						X										CHU00014215E & CHU00014215	Wiebo Jan Vaartjes	Wiebo Jan Vaartjes Dep. Vol. 1, 321:22-330:7

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
3/22/2006	n/a				X														X	SDI: Woongrae Kim SDI: Mr. Seong THOM: Jack Brunk	SDCRT-0007240		
3/31/2006	n/a	X			X						X	X			X	X			X	MTPD: Tsuruta Shinichiro	MTPD-0479599		
4/26/2006					X							X								Hun Sul Chu (SDI); Sanogawaya (MTPD)	SDCRT-0007261	HS Chu	
5/19/2006	n/a	X		X	X						X	X			X	X				MTPD: Tsuruta Shinichiro	MTPD-0468623	Hirokazu Nishiyama 30(b)(6); Hirokazu Nishiyama; Tatsuo Tobinaga 30(b)(6)	Nishiyama 30(b)(6) 124; Nishiyama 125, 232, 243, 265; Tobinaga 30(b)(6) 125, 235
6/00/2006			X		X				X		X								X		SDCRT-0005949	KC Oh	
6/00/2006	Osaka, Japan				X						X	X								MTPD: Nishimaru, Kazuhiro LPD: Park, Edmond SDI: Park, Kevin		Kazuhiro Nishimaru	101:23-102:3; 250:7-251:17
6/1/2006					X						X	X										Nishimaru	Nishimaru II at 329-31
6/1/2006	Osaka				X						X	X									MTPD-0479681	Nishimaru	Nishimaru II at 341-47
6/5/2006					X						X	X							X	MTPD: Tsuruta Shinichiro MTPD: Komori MTPD: Nishimura	MTPD-0479681	Shinichiro Tsuruta; Kazuhiro Nishimaru	Tsuruta 62, 80, 96; Nishimaru 341
6/12/2006											X	X								MTPD: Tsuruta LPD: Park, Edmond (SBI Manager, Strategy Business intelligence) LPD: Qian, Philip (Assistant Manager) SDI: Lee, Mokyung (Assistant Manager, Marketing Team) MTPD: Ueda, TL MTPD: Nishimaru, SA MTPD: Kitamura, SJ MTPD: Komori SJ,	MTPD-0094874	Iwamoto, Shinichi	
6/19/2006					X						X	X								LPD: Edmund Park LDP: Philip Qian SDI: Mokyung Lee MTPD: Ueda TL MTPD: Nishimaru SA MTPD: Kitamura SJ MTPD: Komori SJ	MTPD-0479668, MTPD-0479669, MTPD-0479670		
6/19/2006					X						X	X								LPD: Park, Edmond; Qian, Philip SDI: Lee, Bokyung MTPD: Ueda; Nishimaru; Kitamura; Kobayashi; Tsuruta	MTPD-0094874	Kazuhiro Nishimaru; Shinichiro Tsuruta	Nishimaru: 326:20-331:20 Tsuruta: 399:10-405:23
6/19/2006		X		X	X	X					X	X			X	X			X	LPD: Edmond Park LPD: Philip Qian SDI: Bokyung Lee MTPD: TL Ueda MTPD: Sa Nishimaru MTPD: SJ Kitamura MTPD: SJ Komoro MTPD: Tsuruta	MTPD-0479670		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/6/2006	China				X						X									SDI - SK Sung; LPD - Choi	SDI rog responses	SK Sung	149:25-150:10
7/7/2006					X							X								Hun Sul Chu (SDI); Nishimura (MTPD)	SDCRT-0091901	HS Chu	
7/21/2006					X						X	X							X	SDI: Sa Woon K SDI: Mi Kim S SDI: Kyu Seok Park D. THOM: Mr. Xin Feng	SDCRT-0091871		
9/5/2006		X			X						X	X	X							MTPD: Yasukawa, Kinoshita	MTPD-0479714; CHU00030449; PHLP-CRT-089887; MTPD-0533137	Nishiyama, Sanogawaya	Nishiyama III at 397-403, Sanogawaya II at 297-301
9/5/2006 9/6/2006	Hotel Equatorial, Kuala Lumpur, Malaysia	X		X	X						X	X	X							CPT: S.J. Yang CPT: Jimmy Chen	CHU00030449-457	S.J. Yang	S.J. Yang, Dep. Vol. 2, 278-299 Dep. Vol. 3 359-362
10/11/2006	Email				X	X														HIT: Kumazawa SDI: C.W. Lee	HTP-CRT00056159	Yuuichi Kumazawa	244:1-11 (Yuuichi Kumazawa)
10/24/2006	Tenchi Shunsen Yakichi, Akihabara, Washington Hotel Restaurant				X	X														HIT: Kumazawa, Ito SDI: C.W. Lee	HTP-CRT00056159	Yuuichi Kumazawa Nobuhiko Kobayashi	245:12-23 (Yuuichi Kumazawa) 451 (Nobuhiko Kobayashi)
10/24/2006	Tenchi Shunsen Yakichi, Akihabara, Washington Hotel Restaurant, Tokyo, Japan				X	X														HIT: Nobuaki Itou SDI: CW Lee	HDP-CRT00056218		
11/14/2006					X														X	THOM: Petriat THOM: Emeric Charamel SDI: Meinke SDI: Jung Hwan Suh	SDCRT-0091875		
11/21/2006	Huaxia Hotel, Shanghai, China				X	X					X			X	X				X	BMCC: Wenchiang Fan, Heng Zheng Guang Ze, Dalin Li, Yongchun Chi, Liman Lu, Hai Huang IRI: Xiaolin Shen HIT: Guojun Yang, Jianmin Huang, Peng Guo	CHU00102752		
11/21/2006					X	X					X			X					X	LGP: Joel Garbi SDI: Francisco Mario SDI: Min Kyu Suh second meeting:	SDCRT-0091855		
1/23/2007	China	X			X	X					X			X					X		CHU00033243		
1/23/2007	Tang Paradise Hotel, Xi'an, China		X			X								X					X		CHU00033243, CHU00047657, CHU00047658, CHU00047663, SDCRT-		
2/7/2007		X			X						X	X									MTPD-0543148		



MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
2/17/2007- 2/18/2007		X			X						X	X								CPT: Sheng-Jen CPT: Mr. Yang CPT: Mu-Lin Chen	CHU00030437	Pil Jae Lee	254
3/00/2007	Mexico			X	X															John Choi (OEC); KC Oh (SDI)	SDCRT-0031594	KC Oh	
3/6/2007				X																KC Oh (SDI)	SDCRT-0031662	KC Oh	
3/8/2007		X			X															Tae Gyun Oh (SDI), Chen Lishan (SDI); Li Huabin (SDI); Bruce Liu (CPT); Mark Lin (CPT)	SDCRT-0139342	J.I. Lee	
3/14/2007			X		X															Jeong Yun Shin (SDI)	SDCRT-0031662	KC Oh	
3/14/2007 3/17/2007	Fujian Intercontinental Hotel, Fuzhou, China		X		X						X			X	X				X	first meeting: BMCC: Huang Hai HIT: Guo Peng CPT: Hu Mei-Fang LPD: Yu Jiangnan SDI: Park Kyu, Kim, Kim Jung Kil THOM: Xin Peng, Wang Zhiwei  second meeting: BMCC: Huang Hai HIT: Guo Peng; CPT: Hu Mei-Fang LPD: Yu Jiangnan Samsung SDI: Park Kyu, Kim , Kim Jung Kil THOM: Xin Peng, Wang Zhiwei SEG Samsung: Wang Dong, Liang Zhehan	BMCC-CRT000002761, BMCC-CRT000002762, CHU00032940, CHU00032948, CHU00045142, CHU00045143, CHU00046291, CHU00046340, CHU00046354, CHU00046887, CHU00046888, CHU00665186, CHU00665187, CHU00734335, CHU00734336, CHU00734338, CHU00734342, CHU00734344, CHU00734345, CHU00734772		
3/15/2007 -3/16/2007	Fujian, China	X	X		X	X					X			X	X				X	THOM: Xin Peng THOM: Wang Zhiwei	CHU00734336; CHU00032940		
3/26/2007	China				X						X									SDI - SK Sung; LPD - JM Park	SDI rog responses	SK Sung	150:12-150:25
4/1/2007			X									X								Hun Sul Chu (SDI);	SDCRT-0189859	HS Chu	
4/6/2007		X		X	X	X		X			X	X	X		X	X		X		LPD: DC Ryu	LGE00067201 LGE00067202	Duk Chul Ryu	247
4/19/2007					X											X				Mikami (Sharp); Takashima (Sharp); D.E. Lee (SDI)	SDCRT-0141398	J.I. Lee	
4/27/2007					X							X								MTPD: Sanogawaya	MTPD-0438871	Sanogawaya	Sanogawaya III at 425-31
6/1/2007	China: Qingdao, Aizunke Hotel				X	X					X			X					X	BMCC: Huang, Hai; Chi, Qi-Chang HIT: Guo, Peng LPD: Yu, Jang-Nan SDI: Park, Guixi; Kim, Mei THOM: Xin, Peng	CHU00082287		
7/5/2007	Dongguan, China				X	X								X	X				X	BMCC: Chen, Xi; Li, Dalin IRI: Wang, Ximin SDI: Sung, SK HIT: Wang, Yufeng	BMCC-CRT000105586, CHU00734728, SDCRT-0105131		

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
7/5/2007	China				X	X					X			X	X				X	SDI - SK Sung, ES Hwang, Yun Xie, Mei Jin; Thomson - Saurabh Dhoot, Kumar Neeraj, Prakash Rajeev, Xiangjie Yang, Xhiye Huang, Yongjie Zhu, Peng Xin, Zhiwei Wang, Shanshan Wu; BMCC - Xi Chen, Dailin Li, Hai Huang; Hitachi - Guojun Yang, Yufeng Wang, Ying Dai, Peng Guo; LPD - Jianzhong Sheng, Tao Jiang, Minghui Xu, Jiangnan Yu, Changqi Jin, Yaping Yang, Jing Fang; Irico - Ximin Wang, Zhengrong Yuan	SDCRT-0105131		
7/7/2007	San Diego				X						X									Woong Rae Kim; KC Oh (SDI); Quinn Choi (LPD);	SDCRT-0007615	KC Oh	
7/12/2007					X						X									Jae In Lee (SDI); Dong Hoon Lee (SDI); Kee Choi (SDI);	SDCRT-0170843	KC Oh	
7/12/2007					X						X									SDI - DH Lee, Kee Choi; LPD - JM Park, KY Ko, SK Lee	SDCRT-0170843		
7/16/2007					X						X	X								SDI - DE Lee	SDCRT-0081019		
8/6/2007	Korea				X						X									SDI - DH Lee; LPD - JU Park	SDCRT-0198856		
8/6/2007	China	X									X									SDI - SK Sung; LPD - Park, CK Kim	SDI rog responses; SDCRT-0198856	SK Sung	120:7-134:3
9/3/2007	San Diego				X						X									Woong Rae Kim; KC Oh (SDI); Quinn Choi (LPD);	SDCRT-0199834	KC Oh	
9/11/2007		X	X		X						X									LPD: DC Ryu	LGE00086914	Duk Chul Ryu	275
9/11/2007	China				X						X									SDI - SK Sung	SDCRT-0110475		
9/12/2007	Yeouido				X						X										SDCRT-0160057	Hoon Choi	278:2
9/12/2007	Yeouido				X						X											Hoon Choi	278:2
10/12/2007					X						X									Hun Sul Chu (LPD); Lee (LPD)	SDCRT-0185053	HS Chu	
11/00/2007																					SDCRT-0180438	H.S. Chu	
11/2/2007	China	X			X						X									SDI - IH Oh, JH Jung, TG Oh, SM Nam, Chen Lishan	SDCRT-0139342		
11/2/2007		X			X															Tae Gyun Oh (SDI), Chen Lishan (SDI); Ik Hwan Oh (SDI); Jae Hwan Jung (SDI); Seong Meen Nam (SDI); Bruce Liu (CPT); Mark Lin (CPT); Jason Lu (CPT)	SDCRT-0139342	J.I. Lee	
11/13/2007		X			X						X										LGE00080007	Duk Chul Ryu	280
3/22/0000					X						X	X								MTPD: Tanaka; Nishimura	MTPD-0419572	Kazuhiro Nishimaru; Kazutaka Nishimura	Nishimaru: 443:7-456:8

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
6/20/200		X	X	X	X					X			X							CPT: Liu (Director) CPT: Yang (Senior Manager) LG: Choi, S.Y. LG: Park, K.J. OEC: Cho, H.K. OEC: Lee, H.S. OEC: Min, Karl OEC: Lim, Jerry PHS: Smith, Jim SDI: Kim, Inn SDI: Lee, K.H. SDI: Park, S.K. SDI: Son, Michael T-CRT: Thanasak T-CRT: Sirichai	CHU00031010 & CHU00031010.01E	Jim Smith	Jim Smith Dep. Vol. 1, 168-173
9/7/0000 to 9/8/0000		X	X	X	X								X							CPT: C.C. Liu CPT: Michael Du SDD: Mr. Inn Kim SDD: Mr. K.H. Lee SDD: Mr. D.H. Lee SDD: Mr. D.E. Lee SDD: Mr. Son LG: Mr. Choi LG: Mr. C.G. Kim LG: Mr. P.Y. Jeong LG: Mr. Y.I. Jeong LG: Mr. D.E. Lee Orion: Mr. H.C. Moon Orion: Mr. B.L. Jeong Orion: Mr. Karl Min Orion: Mr. H.S. Oh TCRT: Mr. Thanasak Chaiyavech	CHU0002923-927	C.C. Liu	C.C. Liu, Dep. Vol. 3, 436-446
		X	X	X	X					X											CHU00060408-418	C.C. Liu	C.C. Liu, Dep. Vol. 2, 323-327
		X	X	X	X															CPT: S.J. Yang CPT: C.C. Liu CPT: Michael Du LG: Mr. Park LG: Mr. Yeu LG: Mr. Kim	CHU00028889-892	S.J. Yang	S.J. Yang, Dep. Vol. 1, 134-139
Unknown		X	X	X	X					X	X									CPT: C.C. Liu	CHU00031194-201	C.C. Liu	C.C. Liu, Dep. Vol. 2, 267-274 Dep. Vol. 3, 399-401
Unknown		X	X	X			X				X									CPT: C.C. Liu	CHU00031209-213	C.C. Liu	C.C. Liu, Dep. Vol. 2, 274-275
Unknown					X							X								MTPD: Nishimura, Kazutaka SDI: Osaka representative	MTPD-0426042	Kazutaka Nishimura	
unknown	email				X					X	X										SD-CRT-0002562 & SD- CRT-00002562E	Joseph Killen	Joseph Killen Dep. 118:1-127:20
unknown	email				X					X	X										SDCRT-002582	Joseph Killen	Joseph Killen Dep. 148:20-159:6
unknown	email									X	X										PHLP-CRT-082771	Joseph Killen	Joseph Killen Dep. 231:25-234:15
unknown	Powerpoint				X						X								X		PHLP-CRT-009599	Kris Mortier	Kris Mortier Dep.Vol. 1, 289-292

MEETING DATE	LOCATION	CPT	LG	OEC /DW	SDI	HIT	MEC	MIT	TSB	PHS	LPD	MTPD	TCRT	BMCC	IRI	SMTL	TAT	SONY	THOM	INDIVIDUAL PARTICIPANTS	BEG BATES	DEPONENTS	DEPOSITION TESTIMONY
unknown					X						X								X		PHLP-CRT-015909	Kris Mortier	Kris Mortier Dep.Vol. 2, 458-464
unknown					X						X								X		PHLP-CRT-035906 & attachment PHLP-CRT-035907	Kris Mortier	Kris Mortier Dep.Vol. 2, 484-492
Unknown		X			X						X									LPD: Mr. Lee	n/a	Jim Kang Jung	88
Unknown		X	X		X																n/a	Duk Chul Ryu	170-173
Unknown		X	X		X																n/a	Duk Chul Ryu	184
Unknown							X												X	MEC: Hirokazu Nishiyama		Hirokazu Nishiyama	76, 98-100
Unknown	U.S.									X									X	PHS: Joe Killen		Pat Canavan	112-130, 194
Unknown																			X		TDA00355		
Unknown		X		X	X					X									X		CHU00022689		

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*Lead Counsel for Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates To:

*ALL DIRECT PURCHASER ACTIONS*

**DIRECT PURCHASER PLAINTIFFS'  
SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO DEFENDANTS IRICO  
GROUP CORP. AND IRICO DISPLAY  
DEVICES CO., LTD.'S FIRST SET OF  
INTERROGATORIES TO DIRECT  
PURCHASER PLAINTIFFS**

PROPOUNDING PARTIES: IRICO GROUP CORP.; IRICO DISPLAY DEVICES CO., LTD.

RESPONDING PARTIES: ARCH ELECTRONICS, INC.; CRAGO, D/B/A DASH COMPUTERS, INC.; MEIJER, INC.; MEIJER DISTRIBUTION, INC.; NATHAN MUCHNICK, INC.; PRINCETON DISPLAY TECHNOLOGIES, INC.; RADIO & TV EQUIPMENT, INC.; STUDIO SPECTRUM, INC.; WETTSTEIN AND SONS, INC. D/B/A WETTSTEIN'S

SET NO.: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Direct Purchaser Plaintiffs Arch Electronics, Inc.; Crago, d/b/a Dash Computers, Inc.; Meijer, Inc.; Meijer Distribution, Inc.; Nathan Muchnick, Inc.; Princeton Display Technologies, Inc.; Radio & TV Equipment, Inc.; Studio Spectrum, Inc.; and Wettstein and Sons, Inc. d/b/a Wettstein's (together, "Plaintiffs"), by their attorneys, hereby provide the following objections to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.'s First Set of Interrogatories to Direct Purchaser Plaintiffs (the "Interrogatories") as follows:

### **GENERAL OBJECTIONS**

Each of the following objections is incorporated by reference into each of the responses herein:

1. Plaintiffs and their counsel have not completed their (1) investigation of the facts relating to this case, (2) discovery in this action, or (3) preparation for trial. The following responses are therefore based upon information known at this time and are provided without prejudice to Plaintiffs' right to supplement these responses prior to trial or to produce evidence based on subsequently discovered information. Likewise, Plaintiffs' responses are based upon, and therefore limited by, Plaintiffs' present knowledge and recollection, and consequently, Plaintiffs reserve the right to make any changes to these responses if it appears at any time that inadvertent errors or omissions have been made.

2. Plaintiffs generally object to the Interrogatories, including the Instructions and Definitions, on the ground that they purport to enlarge, expand or alter in any way the plain

1 meaning and scope of any interrogatory or to impose any obligations on Plaintiffs' responses in  
2 excess of those required by the Federal Rules of Civil Procedure. Plaintiffs will respond to these  
3 Interrogatories in accordance with their understanding of the obligations imposed by the Federal  
4 Rules of Civil Procedure.

5 3. Plaintiffs object to the Interrogatories, including the Instructions and Definitions, on  
6 the ground that the information sought is protected by the attorney-client privilege, the attorney  
7 work product doctrine, the settlement privilege, the mediation privilege or is otherwise privileged  
8 and/or immune from discovery. By responding to these Interrogatories, Plaintiffs do not waive,  
9 intentionally or otherwise, any attorney-client privilege, any settlement privilege, any mediation  
10 privilege, attorney work-product or any other privilege, immunity or other protection that may be  
11 asserted to protect any information from disclosure. Accordingly, any response or production of  
12 documents or disclosure of information inconsistent with the foregoing is wholly inadvertent and  
13 shall not constitute a waiver of any such privilege, immunity or other applicable protection.

14 4. Plaintiffs object to these Interrogatories on the ground that they are compound,  
15 conjunctive or disjunctive.

16 5. Plaintiffs object to the Interrogatories on the ground that they duplicate other  
17 requests, in whole or in part, made in MDL No. 1917 in violation of the Court's Order Re  
18 Discovery and Case Management Protocol (April 2, 2012) (Dkt. 1128). Plaintiffs will not  
19 reproduce any material that has been previously produced by another party to MDL No. 1917. *See*  
20 Case Management Order, 2 (Feb. 16, 2021) (Dkt. 5907).

21 6. Plaintiffs object to the Interrogatories on the ground that they are overly broad and  
22 unduly burdensome.

23 7. Plaintiffs object to the Interrogatories on the ground that they are vague, ambiguous,  
24 redundant, harassing or oppressive.

25 8. Plaintiffs object to the Interrogatories on the ground that they require Plaintiffs to  
26 draw legal conclusions.

27 9. Plaintiffs object to the Interrogatories on the ground that the information requested  
28 is neither relevant nor proportional to the needs of the case.



1           10.     Plaintiffs object to the Interrogatories on the ground that they, or any portion of  
2     them, seek production of any information within the possession, custody, or control of any  
3     Defendant, or of publicly available information such that the information is obtainable from some  
4     other source that is more convenient, less burdensome or less expensive, or the production of the  
5     information will impose undue burden, inconvenience, or expense upon Plaintiffs.

6           11.     Plaintiffs reserve the right to modify their allegations based on additional discovery,  
7     additional analysis of existing discovery, discovery not yet completed and/or expert discovery, and  
8     Plaintiffs reserve the right to supplement and/or delete the responses given in light of further  
9     evidence and further analysis of present and subsequently acquired evidence.

10          12.     In addition, in accordance with the Federal Rules of Civil Procedure, Plaintiffs  
11     reserve the right to introduce evidence not yet identified herein supporting Plaintiffs' allegations,  
12     including evidence that Plaintiffs expect to further develop through the course of discovery and  
13     expert analysis.

14          13.     In providing responses to the Interrogatories, Plaintiffs reserve all objections as to  
15     competency, relevance, materiality, privilege, or admissibility as evidence in any subsequent  
16     proceeding in, or trial of, this or any other action for any purpose whatsoever.

17          14.     No incidental or implied admissions are intended in these responses. Plaintiffs'  
18     response to all or any part of any interrogatory should not be taken as an admission that: (a)  
19     Plaintiffs accept or admit the existence of any fact(s) set forth or assumed by the interrogatory; or  
20     (b) Plaintiffs have in their possession, custody or control documents or information responsive to  
21     that interrogatory; or (c) documents or information responsive to that interrogatory exist. Plaintiffs'  
22     response to all or any part of an interrogatory also is not intended to be, and shall not be, a waiver  
23     by Plaintiffs of all or any part of its objection(s) to that interrogatory.

24          15.     Plaintiffs object to the Interrogatories on the ground that the cumulative requests by  
25     Defendants and Co-Conspirators in this litigation exceed the permissible number set forth in the  
26     Federal Rules.

27                   **OBJECTIONS TO CERTAIN DEFINITIONS AND INSTRUCTIONS**

28          1.       Plaintiffs object to the definition of "Claim Form(s)" on the grounds that the term

1 “or similar forms approved by the Court and sent to or otherwise made available to potential Class  
2 Members” is vague and ambiguous and requires Plaintiffs to refer to multiple documents.

3 2. Plaintiffs object to the definition of “Complaint” as vague and ambiguous. Plaintiffs  
4 understand this definition to refer to DPPs’ Consolidated Amended Complaint at ECF No. 436 and  
5 as modified by the Stipulation and Order at ECF No. 996.

6 3. Plaintiffs object to the definition of “Control” to the extent it requires Plaintiffs to  
7 draw legal conclusions.

8 4. Plaintiffs object to the definition of “Co-Conspirators” on the grounds that it is  
9 vague, ambiguous, and unintelligible. Paragraphs 105-111 of DPP’s Consolidated Amended  
10 Complaint (ECF No. 436) describe CRT technology and products and do not enumerate entities.

11 5. Plaintiffs object to the definition of “Document(s)” on the ground that it is  
12 overbroad boilerplate that includes irrelevant examples, such as “package inserts or other  
13 information accompanying medications.” Plaintiffs further object to the extent that the  
14 definition exceeds the scope of the Federal Rules of Civil Procedure.

15 6. Plaintiffs object to the definition of “Irico CRTs” as vague, ambiguous, and  
16 unintelligible. Paragraphs 37-39 of the Complaint identify the Irico entities named as Defendants to  
17 this litigation and allege that those entities manufactured, sold, and distributed CRT Products either  
18 directly or through their subsidiaries or affiliates throughout the United States. The phrase  
19 “including without limitation any Claim Form(s) that reflects purchases from Irico in Sections A,  
20 B, or C of the form” is inconsistent with the preceding language in the definition and renders the  
21 definition unintelligible.

22 7. Plaintiffs object to the definition of “Verified” as vague, ambiguous, and  
23 incomplete. The citation provided does not define the term “Verified.”

24 8. Plaintiffs object to the definition of “You” and “Your” as vague and ambiguous as  
25 it relies on the undefined, capitalized term “Plaintiffs.” If “Plaintiffs” is intended to mean the  
26 parties identified as “Responding Parties” in the Interrogatories, Plaintiffs object to the definition  
27 as overbroad in seeking discovery of class members who are not current Named Plaintiffs and have  
28 not served as Class Representatives and further object on the grounds that this definition seeks the

1 production of documents outside Plaintiffs' possession, custody, and control. Plaintiffs further  
 2 object on the ground that attorneys and agents are included in this definition, and any response or  
 3 production of documents that may subsequently occur pursuant to these Interrogatories shall not  
 4 include any documents protected by the attorney-client privilege, work product doctrine, the  
 5 settlement privilege, or any other applicable privileges or doctrines. Plaintiffs further object to this  
 6 definition to the extent that it refers to any entity other than Plaintiffs.

7 9. Plaintiffs object to the Instructions to the extent they seek to expand the  
 8 requirements of the Federal Rules of Civil Procedure. Plaintiffs will respond in accordance with the  
 9 Federal Rules.

## 10 **RESPONSES**

### 11 **INTERROGATORY NO. 1**

12 Identify any Document(s) that summarize, analyze, evaluate or otherwise compile any  
 13 information contained in Claim Forms.

### 14 **RESPONSE TO INTERROGATORY NO. 1**

15 In addition to Plaintiffs' General Objections and Objections to Certain Definitions and  
 16 Instructions, each of which is incorporated by this reference as though fully set forth herein,  
 17 Plaintiffs object to this Interrogatory on the grounds that it calls for materials that are protected by  
 18 the attorney-client privilege, the work product rule, and/or other evidentiary privilege. Plaintiffs  
 19 further object to this Interrogatory on the grounds that it is vague and ambiguous including in its  
 20 use of the terms "summarize," "analyze," "evaluate," and "otherwise compile." Plaintiffs further  
 21 object to this Interrogatory on the grounds that it is overbroad and duplicative, and harassing in that  
 22 it will interfere with the ongoing claims process as to which Defendants have no interest. Plaintiffs  
 23 further object to this Interrogatory on the ground that the burden on Plaintiffs to describe such an  
 24 overbroad group of documents outweighs any likely benefit and is not proportional to the needs of  
 25 the case. Plaintiffs further object to this Interrogatory on the grounds that it seeks discovery of  
 26 absent class members and serves as an inappropriate end-run around the prohibition on discovery  
 27 of absent class members. Plaintiffs further object to this Interrogatory on the grounds that it seeks  
 28 irrelevant information that is not necessary or proportional. Plaintiffs further object to this

Interrogatory on the grounds that it seeks confidential information of absent class members in violation of their privacy rights. Plaintiffs also object to this Interrogatory on the ground that it is compound.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1**

Plaintiffs hereby incorporate their previous objections and response to this interrogatory, *supra*. Subject to, and without waiving the foregoing objections, Plaintiffs provide the following supplemental response pursuant to an agreement with the Irco Defendants whereby the Irco Defendants “will narrow the scope of the outstanding discovery requests to the information provided in Paragraphs 1(a), (b) and (c) in our proposed stipulation” provided that Plaintiffs provide this information and, subject to the Irco Defendants’ reservation of rights, represent to Plaintiffs “that at this time Irco does not intend to serve further discovery regarding the claims process, the claims administrator or the absent class members.” *See* Rushing July 7, 2021 Ltr.; Werbel July 9, 2021 Ltr. Subject to the foregoing agreement and without waiving the foregoing objections, Plaintiffs provide the following supplemental response:

- a. To date, Direct Purchaser Plaintiffs have identified 1,816 valid claim forms submitted by settlement class members for the direct purchase of CRTs, Televisions or Monitors in the United States. Of the 1,816 valid claim forms, 334 identified purchases of CRTs, 1,549 identified purchases of Televisions, and 992 identified purchases of Monitors.
- b. To date, Direct Purchaser Plaintiffs have identified no valid claims for purchases of a CRT, Television or Monitor by a settlement class member from any of the Irco Defendants.
- c. Direct Purchaser Plaintiffs have no records from any third party documenting direct purchases of Irco CRTs or televisions or monitors containing Irco CRTs in the United States.

Plaintiffs will supplement this response in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

**INTERROGATORY NO. 2**

Separately, for each Defendant or Co-Conspirator listed on the Claim Form, Identify:

- a. The total number of submitted and Verified Claim Forms that include purchases from that Defendant or Co-Conspirator in Section A of the Claim Forms;
- b. The total dollar amount of purchases from that Defendant or Co-Conspirator detailed in Section A of the submitted and Verified Claim Forms;
- c. The total number of submitted and Verified Claim Forms from that Defendant or Co-Conspirator that include purchases in Section B of the Claim Forms;
- d. The total dollar amount of purchases from that Defendant or Co-Conspirator detailed in Section B of the submitted and Verified Claim Forms;
- e. The total number of submitted and Verified Claim Forms that include purchases from that Defendant or Co-Conspirator in Section C of the Claim Forms; and,
- f. The total dollar amount of purchases from that Defendant or Co-Conspirator detailed in Section C of the submitted and Verified Claim Forms.

**RESPONSE TO INTERROGATORY NO. 2**

In addition to Plaintiffs' General Objections and Objections to Certain Definitions and Instructions, each of which is incorporated by this reference as though fully set forth herein, Plaintiffs further object to this Interrogatory on the ground that it is vague and ambiguous as to the meaning of "Identify," "Co-Conspirator," "Verified," and "submitted." Plaintiffs further object to this Interrogatory on the ground that the burden on Plaintiffs to provide this analysis of the claims process outweighs its likely benefit and is not proportional to the needs of the case. Plaintiffs object to this Interrogatory on the ground that it is compound. Plaintiffs further object to this Interrogatory on the grounds that it calls for (or could be construed to call for) materials that are protected by the attorney-client privilege, the work product rule or other evidentiary privilege. Plaintiffs further object to this Interrogatory on the grounds that Defendants' sales information is more easily available to Defendants from their own records and from discovery already produced in this litigation. Plaintiffs further object to this Interrogatory on the grounds that it seeks discovery of absent class members and serves as an inappropriate end-run around the prohibition on discovery

1 of absent class members. Plaintiffs further object to this Interrogatory on the grounds that it seeks  
2 irrelevant information that is not necessary or proportional. Plaintiffs further object to this  
3 Interrogatory on the grounds that it seeks confidential information of absent class members in  
4 violation of their privacy rights. Plaintiffs further object to this Interrogatory on the grounds that it  
5 is overbroad and duplicative, and harassing in that it will interfere with the ongoing claims process  
6 as to which Defendants have no interest.

7 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2**

8 Plaintiffs hereby incorporate their previous objections and response to this interrogatory,  
9 *supra*. Subject to, and without waiving the foregoing objections, Plaintiffs supplement their  
10 response as follows:

11 *See* supplemental response to Interrogatory No. 1, *supra*.

12  
13 **INTERROGATORY NO. 3**

14 Identify any claims submitted involving Irco CRTs not Identified in Your response to  
15 Interrogatory No. 2.

16 **RESPONSE TO INTERROGATORY NO. 3**

17 In addition to Plaintiffs' General Objections and Objections to Certain Definitions and  
18 Instructions, each of which is incorporated by this reference as though fully set forth herein,  
19 Plaintiffs further object to this Interrogatory on the ground that it is vague and ambiguous in its use  
20 of terms "claims submitted," "Irco CRTs," and "involving." Plaintiffs further object to this  
21 Interrogatory on the grounds that it calls for (or could be construed to call for) materials that are  
22 protected by the attorney-client privilege, the work product rule or other evidentiary privilege.  
23 Plaintiffs further object to this Interrogatory on the grounds that it seeks individualized discovery  
24 of absent class members and serves as an inappropriate end-run around the prohibition on  
25 discovery of absent class members. Plaintiffs further object to this Interrogatory on the grounds  
26 that it seeks information about individualized claims that are not necessary or proportional at this  
27 stage of the litigation. Plaintiffs further object to this Interrogatory on the grounds that it seeks  
28 confidential information of absent class members in violation of their privacy rights. Plaintiffs

1 further object to this Interrogatory on the grounds that it is overbroad and duplicative, and  
2 harassing in that it will interfere with the ongoing claims process as to which Defendants have no  
3 interest.

4 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3**

5 Plaintiffs hereby incorporate their previous objections and response to this interrogatory,  
6 *supra*. Subject to, and without waiving the foregoing objections, Plaintiffs supplement their  
7 response as follows:

8 *See* supplemental response to Interrogatory No. 1, *supra*.

9  
10 DATED: July 14, 2021

By: /s/ R. Alexander Saveri

11 Guido Saveri  
12 R. Alexander Saveri  
13 Geoffrey C. Rushing  
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28

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10 *Lead Counsel for Direct Purchaser Plaintiffs*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **OAKLAND DIVISION**  
15

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18  
19 This Document Relates To:

20 *ALL DIRECT PURCHASER ACTIONS*  
21  
22  
23

**DIRECT PURCHASER PLAINTIFFS'  
OBJECTIONS AND RESPONSES TO  
DEFENDANTS IRICO GROUP CORP.  
AND IRICO DISPLAY DEVICES CO.,  
LTD.'S FIRST SET OF REQUESTS  
FOR ADMISSION TO DIRECT  
PURCHASER PLAINTIFFS**

1 PROPOUNDING PARTIES: IRICO GROUP CORP.; IRICO DISPLAY DEVICES CO.,  
2 LTD.

3 RESPONDING PARTIES: ARCH ELECTRONICS, INC.; CRAGO, D/B/A DASH  
4 COMPUTERS, INC.; MEIJER, INC.; MEIJER  
5 DISTRIBUTION, INC.; NATHAN MUCHNICK, INC.;  
6 PRINCETON DISPLAY TECHNOLOGIES, INC.; RADIO  
& TV EQUIPMENT, INC.; STUDIO SPECTRUM, INC.;  
WETTSTEIN AND SONS, INC. D/B/A WETTSTEIN'S

7 SET NO.: ONE  
8

9 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Direct Purchaser  
10 Plaintiff class representatives Arch Electronics, Inc.; Crago, d/b/a Dash Computers, Inc.; Meijer,  
11 Inc.; Meijer Distribution, Inc.; Nathan Muchnick, Inc.; Princeton Display Technologies, Inc.; Radio  
12 & TV Equipment, Inc.; Studio Spectrum, Inc.; and Wettstein and Sons, Inc. d/b/a Wettstein's  
13 (together, "Plaintiffs"), by their attorneys, hereby provide the following objections to Defendants  
14 Irico Group Corp. and Irico Display Devices Co., Ltd.'s First Set of Requests for Admission to  
15 Direct Purchaser Plaintiffs (the "Requests") as follows:

16 **GENERAL OBJECTIONS**

17 Each of the following objections is incorporated by reference into each of the responses herein:

18 1. Plaintiffs and their counsel have not completed their (1) investigation of the facts  
19 relating to this case, (2) discovery in this action, or (3) preparation for trial. The following  
20 responses are therefore based upon information known at this time and are provided without  
21 prejudice to Plaintiffs' right to supplement these responses prior to trial or to produce evidence  
22 based on subsequently discovered information. Likewise, Plaintiffs' responses are based upon, and  
23 therefore limited by, Plaintiffs' present knowledge and recollection, and consequently, Plaintiffs  
24 reserve the right to make any changes to these responses if it appears at any time that inadvertent  
25 errors or omissions have been made.

26 2. Plaintiffs generally object to the Requests, including the Instructions and  
27 Definitions, on the ground that they purport to enlarge, expand, or alter in any way the plain  
28 meaning and scope of any requests or to impose any obligations on Plaintiffs' responses in excess

1 of those required by the Federal Rules of Civil Procedure. Plaintiffs will respond to these Requests  
2 in accordance with their understanding of the obligations imposed by the Federal Rules of Civil  
3 Procedure.

4 3. Plaintiffs object to the Requests, including the Instructions and Definitions, on the  
5 ground that the information sought is protected by the attorney-client privilege, the attorney work  
6 product doctrine, the settlement privilege, the mediation privilege or is otherwise privileged and/or  
7 immune from discovery. By responding to these Requests, Plaintiffs do not waive, intentionally or  
8 otherwise, any attorney-client privilege, any settlement privilege, any mediation privilege, attorney  
9 work-product or any other privilege, immunity or other protection that may be asserted to protect  
10 any information from disclosure. Accordingly, any response or production of documents or  
11 disclosure of information inconsistent with the foregoing is wholly inadvertent and shall not  
12 constitute a waiver of any such privilege, immunity, or other applicable protection.

13 4. Plaintiffs object to these Requests on the ground that they are compound,  
14 conjunctive, or disjunctive.

15 5. Plaintiffs object to the Requests on the ground that they duplicate other requests, in  
16 whole or in part, made in MDL No. 1917 in violation of the Court's Order Re Discovery and Case  
17 Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs will not reproduce any material  
18 that has been previously produced by another party to MDL No. 1917. *See* Case Management  
19 Order at 2 (Feb. 16, 2021) (ECF No. 5907).

20 6. Plaintiffs object to the Requests on the ground that they request Plaintiffs to produce  
21 documents outside its possession, custody, or control.

22 7. Plaintiffs object to the Requests on the ground that they are overly broad and unduly  
23 burdensome.

24 8. Plaintiffs object to the Requests on the ground that they are vague, ambiguous,  
25 redundant, harassing, or oppressive.

26 9. Plaintiffs object to the Requests on the ground that they require Plaintiffs to draw  
27 legal conclusions.

28 10. Plaintiffs object to the Requests on the ground that the information requested is

1 neither relevant nor proportional to the needs of the litigation.

2 11. Plaintiffs object to the Requests on the ground that they, or any portion of them,  
3 seek production of any information within the possession, custody, or control of any Defendant, or  
4 of publicly available information such that the information is obtainable from some other source  
5 that is more convenient, less burdensome or less expensive, or the production of the information  
6 will impose undue burden, inconvenience, or expense upon Plaintiffs.

7 12. Plaintiffs reserve the right to modify their allegations based on additional discovery,  
8 additional analysis of existing discovery, discovery not yet completed and/or expert discovery, and  
9 Plaintiffs reserve the right to supplement and/or delete the responses given in light of further  
10 evidence and further analysis of present and subsequently acquired evidence.

11 13. In addition, in accordance with the Federal Rules of Civil Procedure, Plaintiffs  
12 reserve the right to introduce evidence not yet identified herein supporting Plaintiffs' allegations,  
13 including evidence that Plaintiffs expect to further develop through the course of discovery and  
14 expert analysis.

15 14. In providing responses to the Requests, Plaintiffs reserve all objections as to  
16 competency, relevance, materiality, privilege, or admissibility as evidence in any subsequent  
17 proceeding in, or trial of, this or any other action for any purpose whatsoever.

18 15. No incidental or implied admissions are intended in these responses. Plaintiffs'  
19 response to all or any part of any Requests should not be taken as an admission that: (a) Plaintiffs  
20 accept or admit the existence of any fact(s) set forth or assumed by the request; or (b) Plaintiffs  
21 have in their possession, custody or control documents or information responsive to that request; or  
22 (c) documents or information responsive to that request exist. Plaintiffs' response to all or any part  
23 of a request also is not intended to be, and shall not be, a waiver by Plaintiffs of all or any part of  
24 its objection(s) to that request.

25 **OBJECTIONS TO CERTAIN DEFINITIONS AND INSTRUCTIONS**

26 1. Plaintiffs object to the definition of "Complaint" as vague and ambiguous. Plaintiffs  
27 understand this definition to refer to DPPs' Consolidated Amended Complaint at ECF No. 436 and  
28 as modified by the Stipulation and Order at ECF No. 996.

1           2.       Plaintiffs object to the definition of “Communication(s)” to the extent that this  
2 definition exceeds the scope of the Federal Rules of Civil Procedure and seeks documents  
3 protected by the attorney-client privilege, the attorney work product doctrine, the settlement  
4 privilege, the mediation privilege or are otherwise privileged and/or immune from discovery.

5           3.       Plaintiffs object to the definition of “Co-Conspirator(s)” as vague and ambiguous.  
6 Paragraphs 81–84 of the Complaint do not enumerate entities. Plaintiffs understand this definition  
7 to refer to persons or entities described in Paragraphs 81–84 of the Complaint.

8           4.       Plaintiffs object to the definition of “CRT Product(s)” as vague and ambiguous.  
9 Plaintiffs understand “CRT Product(s)” to have the same meaning as the definition contained in  
10 Paragraph 1 of the Complaint.

11          5.       Plaintiffs object to the definition of “Defendant(s)” as vague and ambiguous.  
12 Paragraphs 24–80 of the Complaint include entities other than Defendants. Plaintiffs further object  
13 to the definition of “Defendant(s)” to the extent that it excludes the Mitsubishi and Thomson  
14 Defendants in MDL No. 1917.

15          6.       Plaintiffs object to the definition of “Document(s)” on the grounds that it is  
16 overbroad boilerplate that includes irrelevant documents, such as “package inserts or other  
17 information accompanying medications.” Plaintiffs further object to the extent that the definition  
18 exceeds the scope of the Federal Rules of Civil Procedure.

19          7.       Plaintiffs object to the definition of “Evidence From Other Parties” as vague,  
20 ambiguous, and misleading, including in that the Irico Defendants have produced documents it  
21 obtained or contends it obtained from other parties, including related parties it contends are  
22 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
23 object to the definition because it exceeds the scope of Rule 36(a)(1) of the Federal Rules of Civil  
24 Procedure.

25          8.       Plaintiffs object to the definition of “Person” as vague and ambiguous as to the  
26 distinction between “means” and “and includes.”

27          9.       Plaintiffs object to the definition of “You” and “Your” as vague and ambiguous as it  
28 relies on the undefined, capitalized term “Plaintiffs.” If “Plaintiffs” is intended to mean the parties

identified as “Responding Parties” in the Requests, Plaintiffs object to the definition as overbroad in seeking discovery of class members who are not currently serving as Named Plaintiffs and have not served as Class Representatives. Plaintiffs object on the grounds that this definition seeks documents or information outside Plaintiffs’ possession, custody, and control. Plaintiffs further object on the ground that attorneys and agents are included in this definition, and any response or production of documents that may subsequently occur pursuant to these Requests shall not include any documents protected by the attorney-client privilege, work product doctrine, the settlement privilege, or any other applicable privileges or doctrines. Plaintiffs further object to this definition to the extent that it refers to any entity other than Plaintiffs.

10. Plaintiffs object to the Instructions to the extent that they exceed what is required by Rule 36(a)(4) of the Federal Rules of Civil Procedure. Plaintiffs’ responses will comport with the requirements of the Federal Rules.

## **RESPONSES**

### **REQUEST NO. 1**

Admit that You have no Evidence From Other Parties that Irico attended any Glass Meetings as defined in Paragraph 141 of the Complaint.

### **RESPONSE TO REQUEST NO. 1**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term “Glass Meetings as defined in Paragraph 141 of the Complaint” is vague, ambiguous and misleading because “Glass Meetings” are not “defined” in paragraph 141; rather the Complaint alleges that some group meetings “became known as Glass Meetings” and describes those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g., ¶¶ 140, 142–175*). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the

1 Court's Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128).  
2 Plaintiffs also object to this Request as improperly seeking, in contravention of well-established  
3 legal principles, to dismember the overall conspiracy in which Irico participated to focus on its  
4 separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations  
5 on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7,  
6 *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747)  
7 ("If 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not  
8 appropriate, still less is it appropriate in discovery."), and improperly seeking "to carve the alleged  
9 conspiracy into a number of mini-conspiracies." Order Denying Defendants' Motions for Partial  
10 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
11 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

12 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

13 Deny. See Plaintiffs' Objections and Responses to Defendants Irico Group Corp. and Irico  
14 Display Devices Co., Ltd.'s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
15 Interrogatory No. 1, served herewith.

16 **REQUEST NO. 2**

17 Admit that You have no Evidence From Other Parties that Irico attended any Glass  
18 Meetings as defined in Paragraph 32 of the Johnson Report.

19 **RESPONSE TO REQUEST NO. 2**

20 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
21 further object to this Request on the ground that the term "Evidence From Other Parties" is vague,  
22 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
23 obtained or contends it obtained from other parties, including related parties it contends are  
24 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
25 object to this Request on the ground that the term "Glass Meeting as defined in Paragraph 32 of the  
26 Johnson Report" is vague, ambiguous and misleading because "Glass Meetings" are not "defined"  
27 there; rather the Johnson Report describes "Glass Meetings" in several other paragraphs, as well  
28 (*see, e.g., ¶¶ 33–51, 74*). Plaintiffs further object to this Request on the ground that it duplicates

1 other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re  
 2 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to  
 3 this Request as improperly seeking, in contravention of well-established legal principles, to  
 4 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
 5 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
 6 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
 7 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
 8 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
 9 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
 10 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
 11 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
 12 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

13 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

14 Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico  
 15 Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
 16 Interrogatory No. 1, served herewith.

### 17 **REQUEST NO. 3**

18 Admit that You have no Evidence From Other Parties that Irico attended any Green  
 19 Meetings as defined in Paragraph 141 of the Complaint.

### 20 **RESPONSE TO REQUEST NO. 3**

21 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
 22 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,  
 23 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
 24 obtained or contends it obtained from other parties, including related parties it contends are  
 25 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
 26 object to this Request on the ground that the term “Green Meetings as defined in Paragraph 141 of  
 27 the Complaint” is vague, ambiguous and misleading because “Green Meetings” are not “defined”  
 28 in paragraph 141; rather the Complaint and describes those meetings in various paragraphs in the



Complaint, including paragraph 141 (*see, e.g., ¶¶* 140, 142–175). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs, Interrogatory No. 1, served herewith.

#### **REQUEST NO. 4**

Admit that You have no Evidence From Other Parties that Irico attended any Green Meetings as defined in Paragraph 37 of the Johnson Report.

#### **RESPONSE TO REQUEST NO. 4**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term “Green Meeting as defined in Paragraph 37 of

1 the Johnson Report” is vague, ambiguous and misleading because “Green Meetings” are not  
2 “defined” there. Plaintiffs further object to this Request on the ground that it duplicates other  
3 requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re  
4 Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to  
5 this Request as improperly seeking, in contravention of well-established legal principles, to  
6 dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead  
7 of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants  
8 Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray*  
9 *Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
10 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
11 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
12 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
13 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
14 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

15 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

16 Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico  
17 Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
18 Interrogatory No. 1, served herewith.

19 **REQUEST NO. 5**

20 Admit that You have no Evidence From Other Parties that Irico attended any Top Meetings  
21 as defined in Paragraph 141 of the Complaint.

22 **RESPONSE TO REQUEST NO. 5**

23 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
24 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,  
25 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
26 obtained or contends it obtained from other parties, including related parties it contends are  
27 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
28 object to this Request on the ground that the term “Top Meetings as defined in Paragraph 141 of

the Complaint” is vague, ambiguous and misleading because “Top Meetings” are not “defined” in paragraph 141; rather the Complaint alleges that some group meetings “became known as Glass Meetings” and describes those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g., ¶¶ 140, 142–175*). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs, Interrogatory No. 1, served herewith.

#### **REQUEST NO. 6**

Admit that You have no Evidence From Other Parties that Irico attended any Top Meetings as defined in Paragraph 32 of the Johnson Report.

#### **RESPONSE TO REQUEST NO. 6**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are

1 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
2 object to this Request on the ground that the term “Top Meetings as defined in Paragraph 32 of the  
3 Johnson Report” is vague, ambiguous and misleading because “Glass Meetings” including “Top  
4 Meetings” are not “defined” there; rather the Johnson Report describes “Glass Meetings” including  
5 “Top Meetings” in several other paragraphs, as well (*see, e.g.*, ¶¶ 33–51, 74). Plaintiffs further  
6 object to this Request on the ground that it duplicates other requests, in whole or in part, made in  
7 MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol  
8 (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in  
9 contravention of well-established legal principles, to dismember the overall conspiracy in which  
10 Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting  
11 Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories  
12 by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917  
13 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on  
14 summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and  
15 improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order  
16 Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity  
17 at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No.  
18 4097).

19 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

20 Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico  
21 Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
22 Interrogatory No. 1, served herewith.

23 **REQUEST NO. 7**

24 Admit that You have no Evidence From Other Parties that Irico attended any Management  
25 Meetings as defined in Paragraph 141 of the Complaint.

26 **RESPONSE TO REQUEST NO. 7**

27 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
28 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,

1 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
2 obtained or contends it obtained from other parties, including related parties it contends are  
3 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
4 object to this Request on the ground that the term “Management Meetings as defined in Paragraph  
5 141 of the Complaint” is vague, ambiguous and misleading because “Management Meetings” are  
6 not “defined” in paragraph 141; rather the Complaint alleges that some group meetings “became  
7 known as Glass Meetings” and describes those meetings in various paragraphs in the Complaint,  
8 including paragraph 141 (*see, e.g.*, ¶¶ 140, 142–175). Plaintiffs further object to this Request on  
9 the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
10 violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
11 No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-  
12 established legal principles, to dismember the overall conspiracy in which Irico participated to  
13 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
14 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
15 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
16 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
17 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
18 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
19 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
20 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

21 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

22 Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico  
23 Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
24 Interrogatory No. 1, served herewith.

25 **REQUEST NO. 8**

26 Admit that You have no Evidence From Other Parties that Irico attended any Management  
27 Meetings as defined in Paragraph 32 of the Johnson Report.

**RESPONSE TO REQUEST NO. 8**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term “Management Meetings as defined in Paragraph 32 of the Johnson Report” is vague, ambiguous and misleading because “Glass Meetings” including “Management Meetings” are not “defined” there; rather the Johnson Report describes “Glass Meetings” including “Management Meetings” in several other paragraphs, as well (*see, e.g., ¶¶ 33–51, 74*). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs, Interrogatory No. 1, served herewith.

**REQUEST NO. 9**

Admit that You have no Evidence From Other Parties that Irico attended any Working Level Meetings as defined in Paragraph 141 of the Complaint.

**RESPONSE TO REQUEST NO. 9**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term “Working Level Meetings as defined in Paragraph 141 of the Complaint” is vague, ambiguous and misleading because “Working Level Meetings” are not “defined” in paragraph 141; rather the Complaint alleges that some group meetings “became known as Glass Meetings” and describes those meetings in various paragraphs in the Complaint, including paragraph 141 (*see, e.g., ¶¶ 140, 142–175*). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:



Deny. See Plaintiffs' Objections and Responses to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.'s First Set of Requests for Admission to Direct Purchaser Plaintiffs, Interrogatory No. 1, served herewith.

**REQUEST NO. 10**

Admit that You have no Evidence From Other Parties that Irico attended any Working Level Meetings as defined in Paragraph 32 of the Johnson Report.

**RESPONSE TO REQUEST NO. 10**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term "Evidence From Other Parties" is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term "Working Level Meetings as defined in Paragraph 32 of the Johnson Report" is vague, ambiguous and misleading because "Glass Meetings" including "Working Level Meetings" are not "defined" there; rather the Johnson Report describes "Glass Meetings" including "Working Level Meetings" in several other paragraphs, as well (*see, e.g., ¶¶ 33–51, 74*). Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court's Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) ("If 'compartmentalizing' an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery."), and improperly seeking "to carve the alleged conspiracy into a number of mini-conspiracies." Order Denying Defendants' Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*



1 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

2 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

3 Deny. See Plaintiffs' Objections and Responses to Defendants Irico Group Corp. and Irico  
4 Display Devices Co., Ltd.'s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
5 Interrogatory No. 1, served herewith.

6 **REQUEST NO. 11**

7 Admit that You have no Evidence From Other Parties of any meeting between Irico and a  
8 Defendant or Co-Conspirator prior to July 31, 1998.

9 **RESPONSE TO REQUEST NO. 11**

10 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
11 further object to this Request on the ground that the term "Evidence From Other Parties" is vague,  
12 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
13 obtained or contends it obtained from other parties, including related parties it contends are  
14 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
15 object to the term "meeting" as vague and ambiguous to the extent it does not include telephone  
16 calls, emails or other contacts or means of communication. Plaintiffs further object to this Request  
17 on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
18 violation of the Court's Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
19 No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-  
20 established legal principles, to dismember the overall conspiracy in which Irico participated to  
21 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
22 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
23 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
24 2014) (ECF No. 2747) ("If 'compartmentalizing' an alleged conspiracy at trial or on summary  
25 judgment motion is not appropriate, still less is it appropriate in discovery."), and improperly  
26 seeking "to carve the alleged conspiracy into a number of mini-conspiracies." Order Denying  
27 Defendants' Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
28 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

1 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

2 Deny. See Plaintiffs' Objections and Responses to Defendants Irico Group Corp. and Irico  
3 Display Devices Co., Ltd.'s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
4 Interrogatory No. 1, served herewith.

5 **REQUEST NO. 12**

6 Admit that You have no Evidence From Other Parties that Irico attended any meeting with  
7 any Defendant or alleged Co-Conspirator outside of China.

8 **RESPONSE TO REQUEST NO. 12**

9 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
10 further object to this Request on the ground that the term "Evidence From Other Parties" is vague,  
11 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
12 obtained or contends it obtained from other parties, including related parties it contends are  
13 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
14 object to this Request on the ground that it duplicates other requests, in whole or in part, made in  
15 MDL No. 1917, in violation of the Court's Order Re Discovery and Case Management Protocol  
16 (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in  
17 contravention of well-established legal principles, to dismember the overall conspiracy in which  
18 Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting  
19 Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories  
20 by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917  
21 (Aug. 20, 2014) (ECF No. 2747) ("If 'compartmentalizing' an alleged conspiracy at trial or on  
22 summary judgment motion is not appropriate, still less is it appropriate in discovery."), and  
23 improperly seeking "to carve the alleged conspiracy into a number of mini-conspiracies." Order  
24 Denying Defendants' Motions for Partial Summary Judgment Regarding Production and Capacity  
25 at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No.  
26 4097).

27 Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

28 Deny. See Plaintiffs' Objections and Responses to Defendants Irico Group Corp. and Irico

1 Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs,  
2 Interrogatory No. 1, served herewith.

3 **REQUEST NO. 13**

4 Admit that You have no Evidence From Other Parties of direct sales of CRTs to purchasers  
5 in the United States by Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display  
6 Devices Co., Ltd.

7 **RESPONSE TO REQUEST NO. 13**

8 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
9 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,  
10 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
11 obtained or contends it obtained from other parties, including related parties it contends are  
12 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
13 object to the phrase “direct sales of CRTs to purchasers in the United States by Irico Group Corp.,  
14 Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd.” as vague, ambiguous and  
15 confusing. Plaintiffs further object to this Request on the ground that it is premature because  
16 discovery is not yet complete. Plaintiffs further object to this Request on the ground that it  
17 duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s  
18 Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs  
19 also object to this Request as improperly seeking, in contravention of well-established legal  
20 principles, to dismember the overall conspiracy in which Irico participated to focus on its separate  
21 parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG  
22 Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re*  
23 *Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If  
24 ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not  
25 appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged  
26 conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial  
27 Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel)*  
28 *Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

**REQUEST NO. 14**

Admit that You have no Evidence From Other Parties of direct shipments of CRTs from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd. to the United States.

**RESPONSE TO REQUEST NO. 14**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to the phrase “direct shipments of CRTs from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd. to the United States” as vague, ambiguous and confusing. Plaintiffs further object to this Request on the ground that it is premature because discovery is not yet complete. Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

**REQUEST NO. 15**

Admit that You have no Evidence From Other Parties of direct sales of CRT Products to

1 purchasers in the United States by Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico  
2 Display Devices Co., Ltd.

3 **RESPONSE TO REQUEST NO. 15**

4 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
5 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,  
6 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
7 obtained or contends it obtained from other parties, including related parties it contends are  
8 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
9 object to the phrase “direct sales of CRT Products to purchasers in the United States by Irico Group  
10 Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd.” as vague, ambiguous  
11 and confusing. Plaintiffs also object to this Request on the ground that the term “CRT Products” is  
12 vague and ambiguous. Plaintiffs understand this term to have the same meaning as the definition  
13 contained in Paragraph 1 of the Complaint. Plaintiffs further object to this Request on the ground  
14 that it is premature because discovery is not yet complete. Plaintiffs further object to this Request  
15 on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
16 violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
17 No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-  
18 established legal principles, to dismember the overall conspiracy in which Irico participated to  
19 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
20 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
21 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
22 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
23 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
24 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
25 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
26 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

27 **REQUEST NO. 16**

28 Admit that You have no Evidence From Other Parties of direct shipments of CRT Products

1 from Irico Group Corp., Irico Group Electronics Co., Ltd, or Irico Display Devices Co., Ltd. to the  
2 United States.

3 **RESPONSE TO REQUEST NO. 16**

4 Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs  
5 further object to this Request on the ground that the term “Evidence From Other Parties” is vague,  
6 ambiguous, and misleading, including that the Irico Defendants have produced documents it  
7 obtained or contends it obtained from other parties, including related parties it contends are  
8 separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further  
9 object to the phrase “direct shipments of CRT Products from Irico Group Corp., Irico Group  
10 Electronics Co., Ltd, or Irico Display Devices Co., Ltd. to the United States” as vague, ambiguous  
11 and confusing. Plaintiffs also object to this Request on the ground that the term “CRT Products” is  
12 vague and ambiguous. Plaintiffs understand this term to have the same meaning as the definition  
13 contained in Paragraph 1 of the Complaint. Plaintiffs further object to this Request on the ground  
14 that it is premature because discovery is not yet complete. Plaintiffs further object to this Request  
15 on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in  
16 violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF  
17 No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-  
18 established legal principles, to dismember the overall conspiracy in which Irico participated to  
19 focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and  
20 Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct  
21 Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20,  
22 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary  
23 judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly  
24 seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying  
25 Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In*  
26 *re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

27 **REQUEST NO. 17**

28 Admit that You have no Evidence From Other Parties that Irico sold CDTs after 2003.

**RESPONSE TO REQUEST NO. 17**

Plaintiffs incorporate their General Objections as though fully set forth herein. Plaintiffs further object to this Request on the ground that the term “Evidence From Other Parties” is vague, ambiguous, and misleading, including that the Irico Defendants have produced documents it obtained or contends it obtained from other parties, including related parties it contends are separate entities; and that it depends on/requires the resolution of disputed issues. Plaintiffs further object to this Request on the ground that the term “CDTs” is undefined and thus is vague and ambiguous. Plaintiffs understand this term to have the same meaning as the definition contained in Paragraph 1 of the Complaint. Plaintiffs further object to this Request on the ground that it is premature because discovery is not yet complete. Plaintiffs further object to this Request on the ground that it duplicates other requests, in whole or in part, made in MDL No. 1917, in violation of the Court’s Order Re Discovery and Case Management Protocol (April 2, 2012) (ECF No. 1128). Plaintiffs also object to this Request as improperly seeking, in contravention of well-established legal principles, to dismember the overall conspiracy in which Irico participated to focus on its separate parts, instead of looking at it as a whole, Order Adopting Report and Recommendations on LG Defendants Motion to Compel Responses to Interrogatories by Direct Action Plaintiffs at 7, *In re Cathode Ray Tube (CRT) Antitrust Litig.*, MDL No. 1917 (Aug. 20, 2014) (ECF No. 2747) (“If ‘compartmentalizing’ an alleged conspiracy at trial or on summary judgment motion is not appropriate, still less is it appropriate in discovery.”), and improperly seeking “to carve the alleged conspiracy into a number of mini-conspiracies.” Order Denying Defendants’ Motions for Partial Summary Judgment Regarding Production and Capacity at 1–2, *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (Nov. 4, 2011) (ECF No. 4097).

Subject to, and without waiving the foregoing objections, Plaintiffs respond as follows:

Deny. See Plaintiffs’ Objections and Responses to Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s First Set of Requests for Admission to Direct Purchaser Plaintiffs, Interrogatory No. 1, served herewith.

1 DATED: February 23, 2022

By: /s/ R. Alexander Saveri

2 R. Alexander Saveri  
3 Geoffrey C. Rushing  
4 Cadio Zirpoli  
5 Matthew D. Heaphy  
6 Sarah Van Culin  
7 SAVERI & SAVERI, INC.  
8 706 Sansome Street  
9 San Francisco, California 94111  
10 Telephone: (415) 217-6810  
11 Facsimile: (415) 217-6813  
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# **Exhibit 79**

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88634956093 T-340 P.01  
001

[Entire Document Handwritten]

→ *CPTF* Yeh

Submit

Main Topic: China *CDT MAKER* Coordination Meeting

Details:

1. *M.S. Lee* of SDD Shenzhen is responsible for setting up a negotiation meeting in Shenzhen on 8/5 (Wednesday) *PM* 2200 with *BMCC*, Huafei, *CPTF*, and IRICO Xian.
2. Previously, *BMCC* and SDD expressed to *CPTF* that there should be a meeting, and that it would be best to have *CPTF* call the meeting. Employee agreed ~~deeply~~, but has not agreed to have *CPTF* call the meeting. For the selling price increase this time, there was phone contact especially made to *BMCC* to request that *BMCC* help us achieve this goal. There was also an expedited request for SDD to call the meeting. (This way, it would not be too obvious).

Plan of Action: Proposed this meeting

1. Exchange information on each maker's production/sales [Illegible and crossed out] and inventory; however, *CPTF*'s current inventory is too high. It was not appropriate to disclose it. Only claimed that under the July restriction to ship ahead of schedule, the inventory was 70~80K.
2. *CPTF* plans to make 15". Therefore, ~~will not~~ 14" will not be in excess of supply.

[Handwritten in left margin:] Instruction from President Fang: August 14" 350K must [Illegible] difference [Illegible]

3. *BMCC* is concerned that there is no room for price increase. Requested it not to sell 8/1-8/15 (not sell inventory either), but to *follow* after the price increase succeeds.
4. There was only 20% tax added in SDD and Huafei's internal sales quote. That is equivalent to lowering the price under cover. Please ask them to clarify.
5. Further [Illegible and crossed out] understand each maker's future plans for expansion or line conversion.

[Handwritten in left margin:] Also cannot use B tube again

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

6. There will be a regular *meeting* every 2-3 months to exchange information and customer sales/production status.

End of Report

[Initialed in left margin:] Chih-Chun (C.C.) Liu 8/3

[Signed and submitted by:] Employee Chung-Cheng (Alex) Yeh 7/31 '98

---

English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].

[Page Intentionally Omitted]

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English words found in the original text are *italicized*.  
Translator's remarks are indicated in brackets [ ].



星

CPT

年 月 日  
第 页 共 页

主题: 中国大陆 COT 行业协调会

说明: 1. 三星深圳 M.S. Lee 负责联系 BMCC, 華形, CPT  
及 西中彩虹 預定於 於 (三) PM 2:00 在 深圳  
召開 協商會議。

2. 先前 BMCC 及 三星也向 CPT 表態 在召開全設 且  
好由 CPT 召開 取則 表示 深表贊同 但 稱 需向  
CPT 召開 此次 銅漲 常例 特 電洽 BMCC 請 BMCC  
與 吳義盛 並 促請 三星 召開 (這樣 不會 錯 是 太 晚)

據辦: 此次 向 全 撥

3. 據 合 理 估 計 1. 交通 各 車 銷 庫 存 有 料 但 CPT 現 有 庫 存 過 高

8 月 5 日 14:30 開 會

2. 三星 不宜 明 講 只 稱 在 7 月 抵 到 後 前 路 下 庫 存 70 萬 噸

3. CPT 有 做 15 的 計 劃 故 14 不 會 像 在 過 剩

3. BMCC 擔 心 價格 混 不 上 去 請 吳 義 盛 先 不 要 貿 然 降 價

漲 存 均 後 請 吳 follow

4. 華形 三星 內 銷 額 面 只 加 20% 被 等 於 是 受 到 降 價 滿 其

另 不 能 再 責 說明

次 再 再 再 各 家 後 續 擴 充 或 改 善 設 計

6. 每 2-3 月 定 期 meeting 交 換 情 報 及 戶 戶 銷 水 況

中華映管福州有限公司

陳 義 盛

130 ~ 150K  
POL 6K  
CIN 10K  
M2 8K  
KOR 6K

15" price.

# **Exhibit 80**

MARIO N. ALIOTO, ESQ. (56433)  
LAUREN C. CAPURRO, ESQ. (241151)  
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
2001 Union Street, Suite 482  
San Francisco, CA 94123  
Telephone: (415) 563-7200  
Facsimile: (415) 346-0679  
E-mail: malioto@tatp.com  
lauren russell@tatp.com

*Lead Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

) Master File No. 3:07-cv-5944-JST

) MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

) **INDIRECT PURCHASER PLAINTIFFS'**  
) **OBJECTIONS AND RESPONSES TO**  
) **THE IRICO DEFENDANTS' SECOND**  
) **SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.

RESPONDING PARTY: Indirect Purchaser Plaintiffs: Brian Luscher, Jeffrey Figone,  
Carmen Gonzalez, Dana Ross, Steven Ganz, Law Suites, Sandra  
Riebow, Travis Bureau, Southern Office Supply, Inc., Kerry Lee  
Hall, Lisa Reynolds, David Norby, Barry Kushner, Ryan Rizzo,  
Charles Jenkins, Misti Walker, Steven Fink, Gregory Painter,  
Marylou Hillberg, in her capacity as the Personal Representative  
for the Estate of William Craig Stephenson, Conrad Carty, Janet  
Ackerman, Louise Wood, Patricia Andrews, Gary Hanson, Donna  
Ellingson-Mack, Frank Warner, Albert Sidney Crigler, Margaret  
Slagle, John Larch, Brigid Terry, David Rooks

SET: Two



Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the June 18, 2008 Stipulated Protective Order, the Indirect Purchaser Plaintiffs Brian Luscher, Jeffrey Figone, Carmen Gonzalez, Dana Ross, Steven Ganz, Law Suites, Sandra Riebow, Travis Burau, Southern Office Supply, Inc., Kerry Lee Hall, Lisa Reynolds, David Norby, Barry Kushner, Ryan Rizzo, Charles Jenkins, Misti Walker, Steven Fink, Gregory Painter, Marylou Hillberg, in her capacity as the Personal Representative for the Estate of William Craig Stephenson, Conrad Carty, Janet Ackerman, Louise Wood, Patricia Andrews, Gary Hanson, Donna Ellingson-Mack, Frank Warner, Albert Sidney Crigler, Margaret Slagle, John Larch, Brigid Terry, David Rooks ("Plaintiffs") hereby respond to the Second Set of Interrogatories (the "Interrogatories") propounded by Defendants Irico Group Corp. and Irico Display Devices Co., Ltd. (collectively, "Irico" or the "Irico Defendants"), as follows:

**PRELIMINARY STATEMENT**

Plaintiffs' responses to the Interrogatories are made solely for the purpose of, and in relation to, this action. The responses set forth herein, while based on a diligent investigation and reasonable inquiry, reflect, and therefore are necessarily limited by, information now known and the records or information still in existence available to plaintiffs, presently recollected and thus far discovered in the course of preparing these responses. Plaintiffs have not yet completed discovery or preparation for trial in this case. Their investigation concerning this matter is still ongoing, and further discovery may be necessary from defendants as well as from third parties. Plaintiffs reserve the right to amend, modify or supplement these responses to incorporate any evidence, facts, documents or other information not yet discovered, or the relevance of which has not yet been identified.

These responses are given without prejudice to plaintiffs' right to rely on or use at trial any or all evidence of any kind in this case, including without limitation documents or other evidence subsequently discovered or omitted from these responses as a result of mistake, error or inadvertence. Plaintiffs do not waive and specifically reserve the right to produce additional documents or other evidence at trial, and to object on appropriate grounds to the introduction of all or any part of these responses.

1 By making the objections and responses herein, Plaintiffs do not concede that the information  
 2 provided is relevant to the claims or defenses of any party or reasonably calculated to lead to the  
 3 discovery of admissible evidence. Nothing in their objections and responses to these Interrogatories  
 4 shall be construed as an admission by Plaintiffs with respect to the competence, admissibility,  
 5 relevance, or materiality of any fact or document, or as an admission of the truth or accuracy of any  
 6 characterization of any information of any kind sought by the Interrogatories. Thus, each of the  
 7 following responses is subject to all objections of and concerning relevance, materiality, and  
 8 admissibility, as well as to all and any other objections on any ground requiring exclusion of any  
 9 response if introduced in Court. Plaintiffs reserve their right to object to use their objections and  
 10 responses herein, or the subject matter thereof, including, without limitation, the right to object on  
 11 any ground at any time to the use of such responses in any discovery procedures in this or any  
 12 proceeding, and/or at trial. All evidentiary objections and grounds accordingly are expressly  
 13 reserved.

14 Plaintiffs further incorporate by reference any evidence identified by the Direct Purchaser  
 15 Plaintiffs in response to any and all of the Interrogatories.

### 16 **GENERAL OBJECTIONS**

17 Each of the following General Objections is considered applicable to, and is hereby  
 18 incorporated into, each and every response by Plaintiffs to the Interrogatories, and each response is  
 19 given without waiving any of the General Objections. The assertion of any General Objection in the  
 20 Response to any Interrogatory should not be considered a waiver of the remaining General  
 21 Objections. Plaintiffs' objections to the Interrogatories, whether general or specific, do not serve as  
 22 an admission by Plaintiffs that responsive information exists and otherwise would have been  
 23 provided by Plaintiffs absent such objections.

24 1. Plaintiffs object to the Interrogatories, and each of them, to the extent that they are  
 25 premature. Plaintiffs' investigation is ongoing and Plaintiffs have not completed discovery of the  
 26 facts relevant to this case. These responses are made for the sole purpose of this action and are based  
 27 on information and/or documents known and available and are limited by Plaintiffs' present  
 28

1 knowledge, information, and belief. Plaintiffs reserve the right to supplement and/or modify any  
2 and all of their responses and objections as they become aware of additional information and/or  
3 documents which warrant such action. Plaintiffs further reserve the right to complete their  
4 investigation and discovery of the facts and to rely at trial or in other proceedings upon information  
5 and documents in addition to that which is provided herein, regardless of whether such information  
6 is newly discovered or newly in existence.

7         2. Plaintiffs object to the Interrogatories, and each of them, as unduly burdensome and  
8 unfair to the extent they seek to have counsel for Plaintiffs present evidentiary support for the  
9 allegations in the Complaint without having completed discovery.

10         3. The prematurity of the Interrogatories and the unfairness and undue burden of  
11 responding to them is attributable in significant part to delays caused by the Irico Defendants'  
12 themselves. Although the fact discovery cutoff is imminent, the Irico Defendants have not  
13 completed their production of documents responsive to Plaintiffs' requests for production. Among  
14 other things, they have produced neither sales invoices nor a spreadsheet summarizing relevant  
15 information from them. Moreover, many of the documents the Irico Defendants have produced were  
16 only produced recently, and Plaintiffs are still reviewing, translating, and analyzing them.  
17 Furthermore, as the Special Master has determined, the Irico Defendants have failed to provide  
18 adequate responses to Plaintiffs' interrogatories requesting core information in this case regarding  
19 their attendance at and participation in meetings with competitors and their involvement in the  
20 operation of the conspiracy. In addition, the Irico Defendants have yet to make two key witnesses  
21 available for deposition, and has refused to produce three others, thereby requiring Plaintiffs to bring  
22 a motion to compel their attendance.

23         4. To compound the unfairness and undue burden of responding to the Interrogatories,  
24 they seek information and the identification of documents that the Irico Defendants themselves  
25 destroyed, lost or otherwise failed to preserve, notwithstanding their clear legal duty to do so. The  
26 Irico Defendants did not create, publicize to its executives or employees or implement an appropriate  
27 litigation hold for at least nine years after this lawsuit was served on them. Thus, the Irico

1 Defendants themselves are responsible for the fact that much of the evidence that would be  
2 responsive to the Interrogatories is no longer in existence, because they themselves destroyed it or  
3 allowed it to be destroyed or lost.

4 5. Plaintiffs object to the Interrogatories, and each of them, to the extent they seek  
5 documents or information (i) not relevant to the subject matter of this action; (ii) not relevant to any  
6 claim or defense in this action; (iii) not reasonably calculated to lead to the discovery of admissible  
7 evidence; (iv) different from, inconsistent with, or in addition to what is required to be produced  
8 under the Federal Rules of Civil Procedure, the Civil Local Rules of the United States District Court  
9 for the Northern District of California, any existing Court Order in this case, or any other applicable  
10 rule or law.

11 6. Plaintiffs object to the Interrogatories to the extent that they are vague, ambiguous  
12 and require speculation to determine their meanings. Plaintiffs respond to these Interrogatories as  
13 they interpret and understand them. If the Irco Defendants subsequently assert an interpretation of  
14 any Interrogatory or response that differs from Plaintiffs' understanding, Plaintiffs reserve the right  
15 to supplement or amend their objections and/or responses.

16 7. Plaintiffs object to the Interrogatories, and each of them, to the extent they call for  
17 the disclosure of information protected by the attorney-client privilege, the attorney work-product  
18 doctrine, or any other applicable law, privilege or protection. Any inadvertent production of  
19 privileged information shall not constitute a waiver of Plaintiffs' right to assert the applicability of  
20 any privilege or protection to any related information, and any such document and all copies or  
21 images thereof shall be promptly returned, sequestered or destroyed upon demand pursuant to Fed.  
22 R. Civ. P. 26(b)(5)(B).

23 8. Plaintiffs object to, and will not answer, the Interrogatories, and each of them, to the  
24 extent that (a) they seek the premature disclosure of expert material subject to Rule 26(a)(2)(C) of  
25 the Federal Rules of Civil Procedure, and/or (b) they seek disclosure of information concerning any  
26 person or entity whom Plaintiffs will not designate as an opinion or other witness at trial.

9. Plaintiffs object to the Interrogatories, and each of them, to the extent they impose an undue burden on Plaintiffs by requiring Plaintiffs to search for documents that are equally available to the Irico Defendants and/or already in their possession, custody, control, or which are publicly available or otherwise readily accessible to them.

10. Plaintiffs object to the Interrogatories to the extent they require Plaintiffs to compartmentalize evidence as proof of allegations in the Complaint instead of looking at it as a whole, which is in contravention of well-established legal principles. *See In re CRT Antitrust Litigation*, Master Docket No. 3:07-cv-05944 SC, Dkt. No. 2747, Order Adopting Recommended Order of the Special Master, dated August 15, 2014; *Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962) (“The character and effect to a conspiracy are not to be judged by dismembering it and viewing its separate parts, but only by looking at it as a whole.”). *See also Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the actions of any of the conspirators in furtherance of the conspiracy are, in law, the actions of all. *Id.*

11. Plaintiffs object to the Interrogatories to the extent they seek information relating to any period beyond the period for which Defendants have provided discovery.

12. Plaintiffs object to Defendant’s definition of the term “Identify” as overbroad, unduly burdensome, and seeking information that is irrelevant and not reasonably calculated to lead to admissible evidence.

13. Plaintiffs hereby incorporate each of the foregoing General Objections into each of the individual responses set forth below, whether or not stated separately therein. No Specific Objection is a waiver of any of the General Objections.

14. Plaintiffs reserve their right to try their case as Plaintiffs determine is best at trial. This includes by not using facts stated herein or using facts in addition to those stated herein.

1 15. Plaintiffs reserve the right to object to and/or challenge any information provided in  
2 response to the Interrogatories on the grounds of competency, relevance, materiality, privilege, or  
3 admissibility at trial or at any hearing or proceeding.

4 16. Plaintiffs object to, and expressly disclaim, any need or intent to prove any fact listed  
5 herein as a prerequisite to proving their claims at trial.

6 17. Plaintiffs object to these Interrogatories to the extent that the underlying Requests for  
7 Admission are propounded improperly or are not relevant to any claim or defense.

8 **RESPONSES AND SPECIFIC OBJECTIONS**

9 **INTERROGATORY NO. 1**

10 If Your response to any Request for Admission was anything other than an unqualified  
11 admission, separately for each Request for Admission:

12 (a) state the number of the request for admission;

13 (b) state all facts upon which You base Your response;

14 (c) Identify all Evidence upon which You intend to rely to support Your response; and

15 (d) Identify each Person who has knowledge of the facts upon which You base Your  
16 response.

17 **RESPONSE TO INTERROGATORY NO. 1:**

18 Plaintiffs incorporate by reference the General Objections set forth in the preceding  
19 paragraphs. Plaintiffs object to the definition of “Evidence From Other Parties” contained in Irico’s  
20 RFAs upon which this Interrogatory is based, and the Irico Defendants’ attempt to limit Plaintiffs’  
21 response this Interrogatory to particular sources of evidence. It is improper to limit an RFA under  
22 Fed. R. Civ. P. 36(a)(1), which permits a party to seek an admission relating to “(A) facts, the  
23 application of law to fact, or opinions about either, or (B) the genuineness of any described  
24 document.” Plaintiffs will not limit their responses to these RFA’s to “Evidence From Other  
25 Parties,” and will respond to the RFA’s as to evidence from any source, including evidence produced  
26 by Irico or its wholly owned subsidiary China National Electronics Import & Export Caihong  
27 Company (“CNEIECC”). Irico has acknowledged that Irico “exported products exclusively through”  
28

1 CNEIECC prior to the formation of Irico Electronics (“Electronics”) in September 2004. *See* January  
2 15, 2009 Response of Irico Group Corporation and Irico Display Devices Co., Ltd. to Plaintiffs’  
3 Information Requests (the “2009 Response”), ECF No. 5220-10 at 1. In addition, a “Master Plan”  
4 created by Irico Group near the end of 2022 describes CNEIECC as “actually serv[ing] as Irico  
5 Group Corporation’s import and export business management department[,]” and “actual assets,  
6 personnel and business all belong to Irico Group Corporation.” IRI-CRT-00002105E. Finally, a  
7 2004 submission to China’s Ministry of Finance that shows CNEIECC as a “wholly-owned”  
8 subsidiary of Irico Group. *See* Dep. Ex. 8394.

9 Plaintiffs further object to this Interrogatory on the grounds that it is premature, and that it  
10 seeks to impose an undue burden on Plaintiffs to state their case on an incomplete record and review  
11 and analyze all information obtained in discovery thus far at this stage of this litigation. Plaintiffs  
12 object that this Interrogatory improperly requires Plaintiffs to marshal all evidence in support of their  
13 case, including all testimony, in responses to written discovery, but particularly while discovery is  
14 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial  
15 information. The Irico Defendants have not completed their production of documents responsive to  
16 Plaintiffs’ requests for production. Among other things, they have produced neither sales invoices  
17 nor a spreadsheet summarizing relevant information from them. Many of the documents the Irico  
18 Defendants have produced were only produced recently, and Plaintiffs are still reviewing,  
19 translating, and analyzing them. In addition, as the Special Master has determined, the Irico  
20 Defendants have failed to provide adequate responses to Plaintiffs’ interrogatories requesting core  
21 information regarding their attendance at and participation in meetings with competitors and their  
22 involvement in the operation of the conspiracy. The Irico Defendants have yet to make two key  
23 witnesses available for deposition, and have refused to produce three others, thereby requiring  
24 Plaintiffs to bring a motion to compel their attendance.

25 Plaintiffs also object to this Interrogatory to the extent it requires Plaintiffs to  
26 compartmentalize evidence as proof of allegations in the Complaint instead of looking at it as a  
27 whole, which is in contravention of well-established legal principles. *See In re CRT Antitrust*



1 *Litigation*, Master Docket No. 3:07-cv-05944 SC, Dkt. No. 2747, Order Adopting Recommended  
2 Order of the Special Master, dated August 15, 2014; *Continental Ore Co. v. Union Carbide &*  
3 *Carbon Corp.*, 370 U.S. 690, 699 (1962) (“The character and effect to a conspiracy are not to be  
4 judged by dismembering it and viewing its separate parts, but only by looking at it as a whole.”). *See*  
5 *also Beltz Travel Service, Inc. v. Int’l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)  
6 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the  
7 acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy  
8 is, in law, the action of all. *Id.*

9 Plaintiffs further object that the individuals involved in the conspiracy did not always identify  
10 their affiliation to a specific corporate entity or their job title in a manner that allows Plaintiffs to  
11 sufficiently respond to this Interrogatory. Plaintiffs also object to this Interrogatory to the extent it  
12 seeks to attribute a particular action to a specific Irco entity when all the Irco entities named as  
13 defendants were owned and controlled and acted pursuant to the overall strategy and direction of  
14 Irco Group Corporation.

15 Finally, Plaintiffs object to this Interrogatory on the grounds that the distinction Irco  
16 attempts to draw in their Requests for Admissions and the subject Interrogatories between “Glass  
17 Meetings,” “Green Meetings,” “Top Meetings,” “Management Meetings,” “Working Level  
18 Meetings” and the like is artificial and is of no moment in determining Irco’s liability in this case.  
19 Binder Documents 1-103, and the chart summarizing many of those documents which Plaintiffs filed  
20 with the Special Master on December 16, 2021 (the “Admissibility Chart”), summarize in great  
21 detail Irco’s knowledge of, attendance at, and participation in meetings in furtherance of the  
22 conspiracy with its co-conspirators to discuss and fix CRT prices, control CRT production, and  
23 exchange material, non-public information over a lengthy period of time. They also show that even  
24 where Irco did not send a representative to a particular meeting, it was kept apprised of, and  
25 participated in, those meetings and the agreements reached through other co-conspirators, notably  
26 Chunghwa. Plaintiffs incorporate both Binder Documents 1-103 themselves and the Admissibility  
27 Chart by reference in response to each and every one of Irco’s Interrogatories.



1 Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:

2 **RFA No. 1:** Evidence that Irico attended at least one Green Meeting includes, but is not  
3 limited to, the documents bearing Bates Numbers: TSA-CRT00156567; TSA-CRT00156568.

4 **RFA No. 2:** Evidence that Irico's high level executives attended meetings with Irico's  
5 competitors, which meetings fall within the definition of "Top Meetings" in Plaintiffs' Complaint,  
6 includes, but is not limited to, the documents bearing the following Bates Numbers: CHU00030688-  
7 91; IRI-CRT-00024215; BMCC-CRT000540532; CHU00047658-62; CHU00734728; BMCC-  
8 CRT000105586; SDCRT-0093977-91; SDCRT-0105131-34; CHU00016621; CHU00016622;  
9 CHU00102751; CHU00102752; CHU00102864; CHU00447509; CHU00447510; SDCRT-  
10 0087340; SDCRT-0090225; SDCRT-0091569; SDCRT-0091980; SDCRT-0091925; SDCRT-  
11 0091950; CHU00102863; CHU00102864.

12 **RFA No. 3:** Evidence that Irico's high level sales managers attended meetings with Irico's  
13 competitors, which meetings fall within the definition of "Management Meetings" in Plaintiff's  
14 Complaint, includes, but is not limited to, the documents bearing the following Bates Numbers:  
15 CHU00102752-54; CHU00030665-67; CHU00030679-83; CHU00030684-87; CHU00030692-94;  
16 CHU00030695-97; CHU00030705-08; CHU00030752-55; SDCRT-0086599-600; CHU00029050-  
17 51; CHU00030797-98; CHU00030819-22; CHU00030823-26; CHU00030827-30; CHU00030843-  
18 45; SDCRT-0086698-99; SDCRT-0086672; CHU00029046; CHU00030941; CHU00030946;  
19 CHU00030953; CHU00030973; CHU00031018; CHU00029110; CHU00031032; CHU00031070;  
20 CHU00031088; CHU00031092; CHU00031113; SDCRT-0087694; SDCRT-0087700; SDCRT-  
21 0006674; BMCC-CRT000142063; SDCRT-0091409; SDCRT-0091573; SDCRT-0091584;  
22 SDCRT-0091942; SDCRT-0091957; BMCC-CRT000105586; SDCRT-0105131; CHU00029131;  
23 CHU00029138; IRI-CRT-00024212-15.

24 **RFA No. 4:** Evidence that Irico attended Glass Meetings with its competitors prior to July  
25 31, 1998 includes, but is not limited to, the documents bearing the following Bates Numbers:  
26 BMCC-CRT000113384; BMCC-CRT000113389; IRI-CRT-00004817; IRI-CRT-00004821; IRI-  
27 CRT-00008236; IRI-CRT-00008241-42.

**RFA No. 5:** Evidence that Irico attended Working Level Meetings with its competitors prior to July 31, 1998 includes, but is not limited to, the documents bearing the following Bates Numbers: BMCC-CRT000113384; BMCC-CRT000113389; BMCC-CRT000113394; IRI-CRT-00008236; IRI-CRT-00008242.

**RFA No. 6:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs will respond at the close of discovery.

**RFA No. 7:** Evidence of meetings between Irico and a Defendant or Co-Conspirator prior to July 31, 1998 includes, but is not limited to, the documents bearing the following Bates Numbers: BMCC-CRT000113367; BMCC-CRT000113368; BMCC-CRT000113372; BMCC-CRT000113374; BMCC-CRT000113378; BMCC-CRT000113379; BMCC-CRT000113380; BMCC-CRT000113381; BMCC-CRT000113382; BMCC-CRT000113384; BMCC-CRT000113389; BMCC-CRT000113392; BMCC-CRT000113393; BMCC-CRT000113394; BMCC-CRT000113395-416; IRI-CRT-00008236; IRI-CRT-00008242; IRI-CRT-00004746 & 4751; IRI-CRT-00004761-64; IRI-CRT-00004769-4773; IRI-CRT-00008316-18; IRI-CRT-00008340; IRI-CRT-00008358-8360.

**RFA No. 8:** Evidence that Irigoien attended meetings with a Defendant or Co-Conspirator outside of China includes, but is not limited to, the documents bearing the following Bates Numbers: IRI-CRT-00024207-08; IRI-CRT-00024317-19; IRI-CRT-00024628; TSA-CRT00216188; TSA-CRT00216189; TSA-CRT00216190; IRI-CRT-00004757; IRI-CRT-00004761-64; IRI-CRT-00004769-4772; TCE-CRT 0021183; IRI-CRT-00018199; IRI-CRT-00008802-03; IRI-CRT-00024205-06; IRI-CRT-00024259-60; TCE-CRT 0022550; TSA-CRT00036206; TCE-CRT 0021189; TSA-CRT00036954; IRI-CRT-00024320-21; IRI-CRT-00024328-30; IRI-CRT-00024345-47; TSA-CRT00153053; TSA-CRT00187175; IRI-CRT-00024628-32; IRI-CRT-00024657-58; IRI-CRT-00024678-4680; IRI-CRT-00024166.

**RFA No. 9:** Evidence that Irico sold CDTs after 2003 includes, but is not limited to, the documents bearing the following Bates Numbers: IRI-CRT-00031184-88.

**RFA No. 10:** Plaintiffs incorporate their objections to this RFA and will not respond to this

Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

**RFA No. 11:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

**RFA No. 12:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

**RFA No. 13:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

**RFA No. 14:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

**RFA No. 15:** Plaintiffs incorporate their objections to this RFA and will not respond to this Interrogatory at this time. Plaintiffs are willing to meet and confer regarding this response.

Plaintiffs have not completed their discovery and preparation in this matter and their investigation of the case is ongoing. Plaintiffs reserve the right to change or supplement the responses to this Interrogatory.

**INTERROGATORY NO. 2**

If You contend that Irico joined the alleged conspiracy prior to July 31, 1998, Identify the date on which You contend that Irico joined the conspiracy, Describe the facts that You rely on to support Your contention, Identify each Document and all Testimony or responses to discovery in this action that You contend supports such a contention, and Identify each Person who has knowledge concerning each contention.

**RESPONSE TO INTERROGATORY NO. 2:**

Plaintiffs object to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Plaintiffs to state their case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Plaintiffs object that this Interrogatory improperly requires Plaintiffs to marshal all evidence in support of their case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial

1 information. The Irco Defendants have not completed their production of documents responsive to  
2 Plaintiffs' requests for production. Among other things, they have produced neither sales invoices  
3 nor a spreadsheet summarizing relevant information from them. Many of the documents the Irco  
4 Defendants have produced were only produced recently, and Plaintiffs are still reviewing,  
5 translating, and analyzing them. In addition, as the Special Master has determined, the Irco  
6 Defendants have failed to provide adequate responses to Plaintiffs' interrogatories requesting core  
7 information regarding their attendance at and participation in meetings with competitors and their  
8 involvement in the operation of the conspiracy. The Irco Defendants have yet to make two key  
9 witnesses available for deposition, and have refused to produce three others, thereby requiring  
10 Plaintiffs to bring a motion to compel their attendance.

11 Plaintiffs further object to this Interrogatory to the extent it requires Plaintiffs to  
12 compartmentalize evidence as proof of allegations in the Complaint instead of looking at it as a  
13 whole, which is in contravention of well-established legal principles. *See In re CRT Antitrust*  
14 *Litigation*, Master Docket No. 3:07-cv-05944 SC, Dkt. No. 2747, Order Adopting Recommended  
15 Order of the Special Master, dated August 15, 2014; *Continental Ore Co. v. Union Carbide &*  
16 *Carbon Corp.*, 370 U.S. 690, 699 (1962) ("The character and effect to a conspiracy are not to be  
17 judged by dismembering it and viewing its separate parts, but only by looking at it as a whole."). *See*  
18 *also Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)  
19 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the  
20 acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy  
21 is, in law, the action of all. *Id.*

22 Plaintiffs further object that the individuals involved in the conspiracy did not always identify  
23 their affiliation to a specific corporate entity or their job title in a manner that allows Plaintiffs to  
24 sufficiently respond to this Interrogatory.

25 Plaintiffs object to this Interrogatory on the grounds that it is compound in that it compiles  
26 several interrogatories into one. Plaintiffs object to this Interrogatory on the grounds that it is vague  
27 and ambiguous as to the meaning of the undefined capitalized term "Describe." Plaintiffs further

1 object to this interrogatory on the grounds that that it is vague and ambiguous as to the meaning of  
2 “joined,” “each contention,” and any intended difference between “alleged conspiracy” and  
3 “conspiracy.” Plaintiffs further object to this interrogatory on the grounds that it is overbroad in  
4 requiring Plaintiffs to identify “each Person” with knowledge of each contention.

5 Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:  
6 Plaintiffs contend that Irico joined the CRT conspiracy at its inception in March 1995. Documents  
7 produced by defendant Beijing Matsushita Color CRT Co., Ltd. contain tables dated February 1995  
8 and March 14, 1995 detailing the CRT production data of various CRT manufacturers including  
9 Irico (referred to as “4400”), for the period from 1993-1998. *See* BMCC-CRT000134418-19,  
10 BMCC-CRT00011394. These documents indicate that Irico was exchanging non-public, future  
11 production data with its competitors as early as February 1995. These were acts in furtherance of the  
12 conspiracy because, as many other documents show, the conspirators often agreed to limit  
13 production in order to fix, raise, or maintain CRT prices.

14 Irico’s minutes of an internal Irico Group Corporation administrative meeting on July 10,  
15 1995 note that Wu Yingzhong referenced a “preparatory meeting” for the “CRT Industry  
16 Association” to be held on July 17<sup>th</sup>, and that the “founding meeting will be held in early August.”  
17 IRI-CRT-00004821.

18 Other documents demonstrate that these CRT Industry Association meetings were part of the  
19 conspiracy. For example, a document dated November 30, 1995, produced by defendant Beijing  
20 Matsushita Color CRT Co., Ltd., is entitled “December CRT Industry Meeting exchange” and was  
21 authored by “Irico Group Sales Company.” BMCC-CRT000113389. The document contains  
22 detailed figures showing Irico’s CRT output, sales, and inventory from January-November 1995, as  
23 well as Irico’s planned production of CRTs for 1996. The last paragraph states, “I hope that our CRT  
24 fellow makers should unite together and act in unison.” *Id.*

25 Irico’s internal minutes of a December 11, 1997 meeting of the plant’s leaders, reflect that  
26 Secretary Tao stated: “An industry meeting was held last week. Each tube maker set the price of 21”  
27 at 620 yuan.” IRI-CRT-00005040. According to Irico’s minutes of a December 1, 1998

1 administrative meeting (IRI-CRT-00008425), Ma Jinqun reported the tube sales situation and  
2 referenced, “The industry meeting, once every month. The November meeting concluded to discuss  
3 with Changhong again about pricing issues.” IRI-CRT-00008427. *See further* Response to RFA No.  
4 4.

5 Plaintiffs believe the following individuals have knowledge relating to the foregoing: Wu  
6 Yingzhong; Zhang Wenyi, Wang Lichang, Wu Weiren, J.S. Lu, S.J. Yang, C.C. Liu, Sha Tao, Ma  
7 Jinqun, Tao Kui, Xing Daoqin, Mu Haoping, Ma Shitai, Niu Wenjun, Li Zhuotai, and anyone else  
8 listed in the documents referred to above, as well as the listed attendees or participants in any of the  
9 contacts in the Binder Documents.

10 Plaintiffs have not completed their discovery and preparation in this matter and their  
11 investigation of the case is ongoing. Plaintiffs reserve the right to change or supplement this  
12 response.

13 **INTERROGATORY NO. 3**

14 If You contend that Irico joined the alleged conspiracy with knowledge of the prior acts of  
15 the conspiracy, Describe the facts that You rely on to support Your contention, Identify each  
16 Document and all Testimony or responses to discovery in this action that You contend supports such  
17 a contention, and Identify each Person who has knowledge concerning each contention.

18 **RESPONSE TO INTERROGATORY NO. 3:**

19 Plaintiffs object to this Interrogatory on the grounds that it is premature, and that it seeks to  
20 impose an undue burden on Plaintiffs to state their case on an incomplete record and review and  
21 analyze all information obtained in discovery thus far at this stage of this litigation. Plaintiffs object  
22 that this Interrogatory improperly requires Plaintiffs to marshal all evidence in support of their case,  
23 including all testimony, in responses to written discovery, but particularly while discovery is  
24 ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial  
25 information. The Irico Defendants have not completed their production of documents responsive to  
26 Plaintiffs’ requests for production. Among other things, they have produced neither sales invoices  
27 nor a spreadsheet summarizing relevant information from them. Many of the documents the Irico

1 Defendants have produced were only produced recently, and Plaintiffs are still reviewing,  
2 translating, and analyzing them. In addition, as the Special Master has determined, the Irco  
3 Defendants have failed to provide adequate responses to Plaintiffs' interrogatories requesting core  
4 information regarding their attendance at and participation in meetings with competitors and their  
5 involvement in the operation of the conspiracy. The Irco Defendants have yet to make two key  
6 witnesses available for deposition, and have refused to produce three others, thereby requiring  
7 Plaintiffs to bring a motion to compel their attendance.

8 Plaintiffs further object to this Interrogatory to the extent it requires Plaintiffs to  
9 compartmentalize evidence as proof of allegations in the Complaint instead of looking at it as a  
10 whole, which is in contravention of well-established legal principles. *See In re CRT Antitrust*  
11 *Litigation*, Master Docket No. 3:07-cv-05944 SC, Dkt. No. 2747, Order Adopting Recommended  
12 Order of the Special Master, dated August 15, 2014; *Continental Ore Co. v. Union Carbide &*  
13 *Carbon Corp.*, 370 U.S. 690, 699 (1962) ("The character and effect to a conspiracy are not to be  
14 judged by dismembering it and viewing its separate parts, but only by looking at it as a whole."). *See*  
15 *also Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980)  
16 (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the  
17 acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy  
18 is, in law, the action of all. *Id.*

19 Plaintiffs further object that the individuals involved in the conspiracy did not always identify  
20 their affiliation to a specific corporate entity or their job title in a manner that allows Plaintiffs to  
21 sufficiently respond to this Interrogatory.

22 Plaintiffs further object to this interrogatory on the grounds that it is vague and ambiguous  
23 as to the meaning of the undefined capitalized term "Describe." Plaintiffs further object to this  
24 interrogatory on the grounds that it is vague and ambiguous as to the meaning of "joined,"  
25 "knowledge," "prior acts," "each contention," and any intended difference between "alleged  
26 conspiracy" and "conspiracy." Plaintiffs further object to this interrogatory on the grounds that it is  
27 overbroad in demanding Plaintiffs identify "each Person" with knowledge of "each contention."



1 Plaintiffs further object to this interrogatory on the grounds that it is duplicative where it overlaps  
2 with Interrogatory No. 2.

3 Subject to and without waiving the foregoing objections, Plaintiffs respond as follows:  
4 Plaintiffs contend that, based on the documents cited in Plaintiffs' response to Interrogatory No. 2,  
5 Irico joined the conspiracy at its inception in or around March 1995. These documents show that  
6 Irico was meeting with its competitors "once every month" (IRI-CRT-00008427) from at least  
7 August 1995—the date of the "founding meeting" of the "CRT Industry Association." IRI-CRT-  
8 00004821. These documents further show that the participants at these meetings discussed and  
9 agreed upon prices and exchanged sensitive future CRT production data. *See, e.g.*, IRI-CRT-  
10 00008236; IRI-CRT-00008427. Given the evidence showing that Irico participated in the conspiracy  
11 from its inception, Irico is jointly and severally liable for all acts of the conspiracy, Plaintiffs need  
12 not show that Irico was aware of all other acts of the conspiracy prior to July 31, 1998.

13 In addition, numerous documents show that Irico regularly met bilaterally with its  
14 competitors prior to July 31, 1998. *See* Response to RFA No. 7. These included meetings with  
15 admitted conspirator Chunghwa Picture Tubes, Ltd.'s Chinese subsidiary Chunghwa Picture Tubes  
16 Fuzhuo, Ltd., and show that Irico was considering joint ventures or other forms of technological  
17 cooperation with defendants Toshiba and Thomson. Thus, even aside from Irico's attendance at the  
18 monthly CRT Industry Meetings, Irico's regular contacts with members of the conspiracy ensured  
19 that it was well informed regarding the global CRT market, and would have had knowledge of the  
20 other CRT meetings that were occurring outside of China.

21 Plaintiffs believe the following individuals have knowledge relating to the foregoing: Wu  
22 Yingzhong, Zhang Wenyi, Wang Lichang, Wu Weiren, JS Lu, SJ Yang, CC Liu, Sha Tao, Ma  
23 Jinquan, Tao Kui, Xing Daoqin, Mu Haoping, Ma Shitai, Niu Wenjun, Li Zhuotai, and anyone else  
24 listed in the documents referred to above, as well as the listed attendees or participants in any of the  
25 contacts in the Binder Documents.

26 Plaintiffs have not completed their discovery and preparation in this matter and their  
27 investigation of the case is ongoing. Plaintiffs reserve the right to change or supplement this



1 response.

2  
3 Dated: February 23, 2022

By: /s/ Mario N. Alioto

4 Mario N. Alioto (56433)  
5 Lauren C. Capurro (241151)  
6 TRUMP, ALIOTO, TRUMP & PRESCOTT LLP  
7 2001 Union Street, Suite 482  
8 San Francisco, CA 94123  
9 Telephone: (415) 563-7200  
10 Facsimile: (415) 346-0679  
11 malioto@tatp.com  
12 [lauren russell@tatp.com](mailto:lauren russell@tatp.com)

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25  
26  
27  
28 *Lead Counsel for Indirect Purchaser Plaintiff*

# **Exhibit 81**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113367.

*(Digital or printed signature here above the line)*

Cindy Wang

---

**Cindy Wang**

Project Number: BLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## The 21" Color Picture Tubes Export Situation from January to May in 1998

(Domestic  
occupancy rate of  
21")

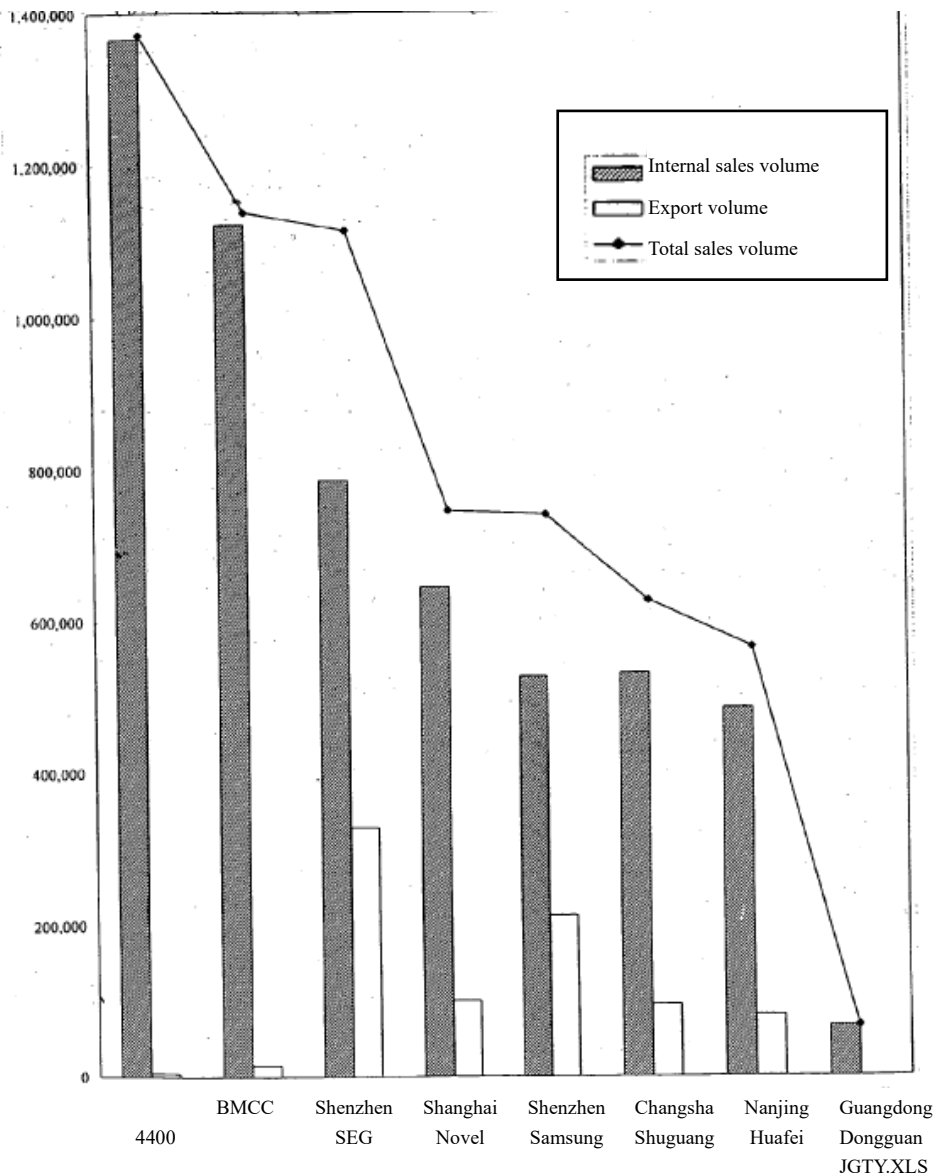
(24.7%) (20.3%) (14.2%) (11.7%) (9.5%) (9.6%) (8.8%) (1.2%)

Unit: piece

June 5, 1998

	4400	BMCC	Shenzhen SEG	Shanghai Novel	Shenzhen Samsung	Changsha Shuguang	Nanjing Huafei	Guangdong Dongguan	Total
Internal sales volume	1,366,572	1,122,226	785,254	644,649	525,709	531,038	484,736	66,244	5,526,428
Export volume	5,000	15,851	328,491	100,000	212,989	95,000	80,000	0	837,331
Total sales volume	1,371,572	1,138,077	1,113,745	744,649	738,698	626,038	564,736	66,244	6,363,759

([export] rate) (0.4%) (1.4%) (29.5%) (13.5%) (28.8%) (15.2%) (14.2%) 0 (13.5%)



CONFIDENTIAL

BMCC-CRT000113367\_E Translation

# **Exhibit 82**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113368.

*(Digital or printed signature here above the line)*

Cindy Wang

---

**Cindy Wang**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## Economic Indicators of Color Picture Tube Factories for First Quarter of 1998

Unit: 10,000

June 5, 1998

Manufacturer	Output	Sales volume	Sales revenue	Total profits	Profit rate
4400	125.9	149.7	80,861	820	1.01%
BMCC	102.8	109.9	61,000	3,137	5.14%
Shanghai Novel	84.0	75.7	50,690	3,100	6.12%
Nanjing Huafei	66.1	64.7	41,132	220	0.53%
Shenzhen SEG	68.3	66.7	35,802	780	2.18%
Guangdong Dongguan	51.6	40.8	35,000	540	1.54%
Changsha Shuguang	55.3	50.7	32,523	-10	-0.03%
Shenzhen Samsung	59.0	59.5	26,747	0	0.00%

JGTY.XLS

CONFIDENTIAL

BMCC-CRT000113368\_E Translation

# **Exhibit 83**





July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113372.

*(Digital or printed signature here above the line)*

Cindy Wang

---

**Cindy Wang**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## Current Status and Development Plan of Domestic Model-21 Color Picture Tubes

Unit: 10,000 pieces

Market department August 15, 1997

Enterprise name		Production Line technology	Production Line type	Tube type	Annual production capacity	Production date	1997 plan	1998 plan	1999 plan	2000 plan	Notes
4400	Existing	Toshiba	Monomer		300		300	300	300	300	
	Add		Monomer								
BMCC	Existing	Panasonic	Monomer		220		165	200	220	220	
	Add	Panasonic	Monomer								
Shanghai Novel	Existing	Toshiba	Compatible	18"21"	150		150	150	150	150	
	Add	Toshiba	Compatible								
Nanjing Huafei	Existing	Philips	Monomer		200		80	200	200	200	
	Add	Philips	Monomer								
Guangdong Dongguan	Existing	Hitachi	Monomer		150		80	100	100	100	
	Add	Hitachi	Monomer								
Shenzhen SEG	Existing	Hitachi	Monomer		240		230	230	230	240	
	Add	Hitachi	Monomer								
Changsha Shuguang	Existing	Jinxing	Compatible	21"25"	150		150	150	150	150	Mainly 21"
	Add	Jinxing	Compatible	21"25"	150	97.8					Mainly 25"
Guangdong Foshan	Existing	Thomson	Monomer								
	Add										
Shenzhen Samsung	Existing										
	Add	Samsung	Compatible	21"25"	180	97.9	50	150	170	180	
Chengdu Hongguang	Existing										
	Add	Hitachi	Monomer		90	98.12			85	90	
SSGE	Existing										
	Add	Sony	Monomer		60	97.6	20	50	60	60	
Total					1890		1225	1530	1665	1690	

295F.XLS

# **Exhibit 84**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113374 to BMCC-CRT000113375.

*(Digital or printed signature here above the line)*

*Cindy Wang*

---

**Cindy Wang**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## Current Status and Development Plan of Domestic CMT

Unit: 10,000 pieces

Market Department

August 15, 1997

Enterprise name		Production Line technology	Production Line type	Tube type	Annual production capacity	Production date	1997 plan	1998 plan	1999 plan	2000 plan	Notes
4400	Existing	Toshiba	Monomer	14"	100		4	20	40	60	
	Add	Toshiba	Compatible	14"15"	100	97.11	2	70	90	100	
BMCC	Existing	Panasonic	Monomer	14"	150		82	80	80	80	
	Add	Panasonic		To be determined					70	120	
Nanjing Huafei	Existing										
	Add	Philips	Monomer	14"	120	97.8	10	100	110	120	
Changsha Shuguang	Existing										
	Add	Jinxing	Compatible	14"15"17"	150	99.1			120	150	
	Add	Jinxing	Compatible	14"15"17"	150	99.12				120	
Shenzhen Samsung	Existing										
	Add	Samsung		14"	180	97.8	15	100	170	180	NO1
	Add	Samsung	Compatible	14"15"17"	300	98.9		50	130	270	NO2, NO3
Tianjin Samsung	Existing										
	Add	Samsung	Compatible	14"15"17"	180	98.5		90	150	180	
Fuzhou, Chunghwa	Existing										
	Add	Taiwan	Compatible	14"15"17"	360	98.3		240	300	360	NO1, NO2
	Add	Taiwan	Compatible	14"15"17"	360	99.3			240	300	NO3, NO4
SSGE	Existing										
	Add	Sony	Monomer	14"	60	98.6		25	40	60	
Total					2210		113	775	1540	2100	

29SF.XLS

July Day RMB3,700,000

August Day RMB1,360,000

7/

9/10 propose (general manager said)

9/7 Sen [illegible]

9/8 AM

# **Exhibit 85**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113378.

*(Digital or printed signature here above the line)*

Cindy Wang

---

**Cindy Wang**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870



[Note: a Japanese name]

[Reference] China CRTMaker Production trend [Unit: 10,000 units/year]

January 9, 1996

No.	Company name	Production capacity in 1995 (1996 estimation)			Approved projects to increase production			Scheduled application project			Reference details
		Number of Lines	Type	Number of production	Number of Lines	Type	Number of production	Number of Lines	Type	Number of production	
1	B M C C	4	21.14.19. 29.14CMT.	318 (411)	—	—	—	3	CMT(14.15. 17).WD.	380	
2	Xianyang 4400	6	14.18.21. 22.25.	600 (700)	—	—	—	2	CPT. CMT.	220	CPT:120. CMT:100.
3	Shanghai Novel	2	18.21.25.	233	1	14.21.	120	1	CMT.	100	14"~12": approval by Shanghai independently
4	Nanjing Huafei	2	17.21.25.	150	4	29.25. CMT (14.15.17)	215	—	—	—	CMT(14.15.17):120. 25":50. 29":45.
5	SEG Hitachi	2	21.	201	—	—	—	1	CMT.	120	
6	Dongguan	2	21.25.	200	—	—	—	2	CPT.CMT.	210	CPT:120.CMT:90.
7	Foshan	1	20.29.	120	—	—	—	1	CPT.	120	
8	Changsha	1	21.25.	120	—	—	—	1	21.29.	120	
9	Fuxin	1	?	?	—	—	—	—	—	—	
10	Shanghai Dianziguan	1	?	?	—	—	—	—	—	—	
11	Chengdu Hongguang	—	—	—	2	20.21.25. 29.	228	—	—	—	20":50.21":110. 25":23.29":45.
12	Shanghai Sony	—	—	—	6	CMT(14.15) 21.25.29. WD(16.20.24)	300	—	—	—	Purpose TVset CTV:180 CE-7-:120
13	Dalian Toshiba	—	—	—	2	14.21.25.29.	300	—	—	—	Purpose TVset CTV:300 CE-7-WD
14	Shenzhen Samsung MAC	—	—	—	—	—	—	4	CPT.	600	
15	Tianjin Samsung	—	—	—	—	—	—	2	CPT.	300	
16	Fuzhou Chunghwa Picture Tubes (Sole Proprietorship)	—	—	—	—	—	—	?	CMT. Monochrome	1,200	CMT:900. Monochrome:300.
Total		1,942 (2,200)			1,163			3,370			

※. ①

※. ②

※. ①:  $2,200 + 1,163 = 33,630$  units/year ( $\times 1.0\%$  Index UP = 36,990 units/year)※. ②:  $3,363 + 3,370 = 67,330$  units/year ( $\times 1.0\%$  Index UP = 74,060 units/year)

※. In 2000, China Domestic CTV demands: 25 million units/year.

# **Exhibit 86**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Cindy Wang**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113379.

*(Digital or printed signature here above the line)*

Cindy Wang

---

**Cindy Wang**

Project Number: BBLLP 2307 P0029

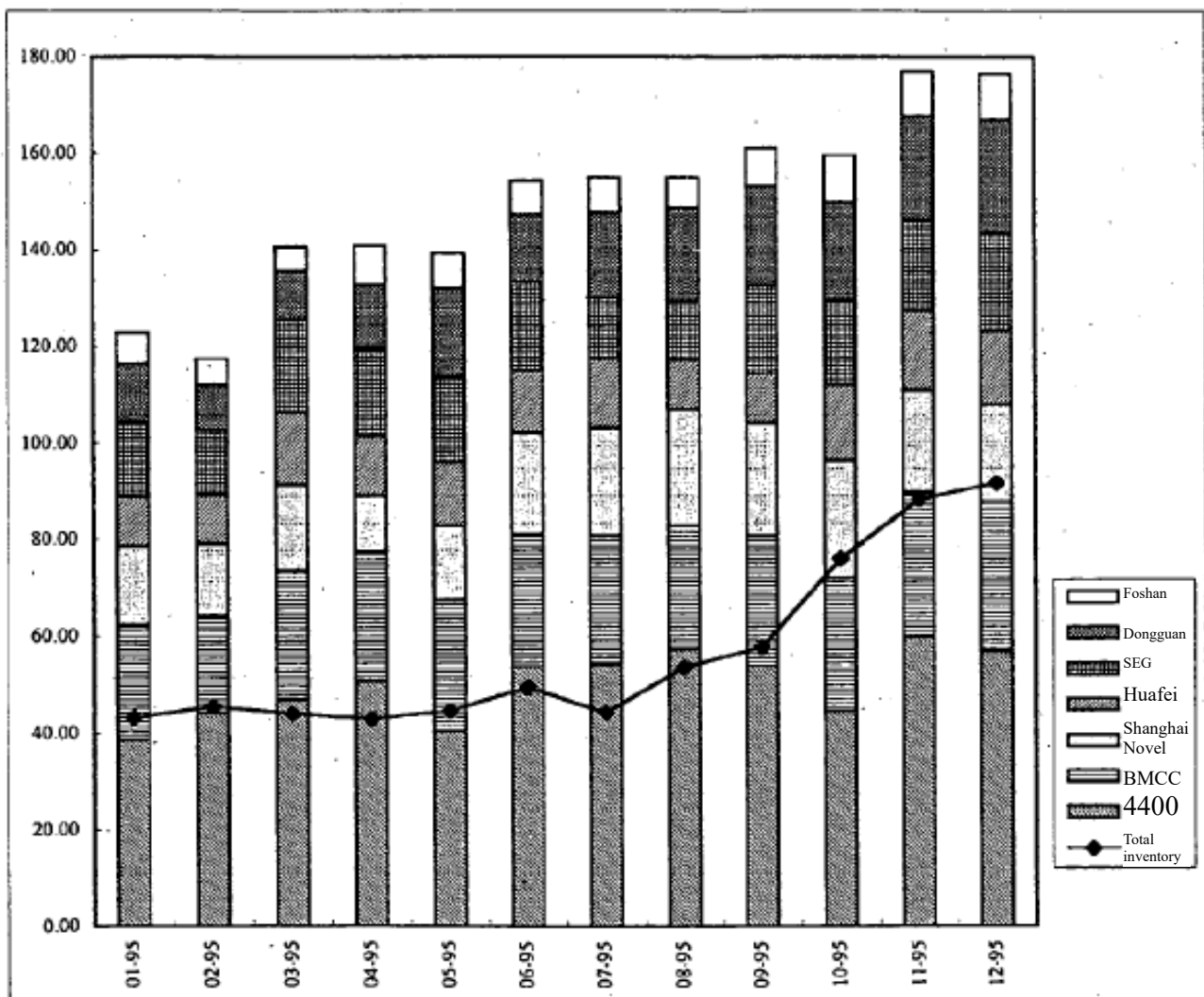
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## CPT Trend

Table of Production and Inventory of Domestic Color Picture Tubes

Unit: 10,000

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95	1-12
Total output	122.88	117.47	140.67	140.84	139.35	154.35	155.06	155.02	161.01	159.56	177.03	176.48	1799.8824
Total sales volume	114.11	115.99	147.21	141.40	137.32	150.44	142.77	154.11	156.74	139.79	164.39	172.93	1731.2466
Total inventory	43.24	45.51	44.07	42.84	44.56	49.35	44.00	53.50	57.69	76.01	88.20	91.59	91.59
4400	38.57	44.21	46.96	50.71	40.31	53.54	54.04	57.15	53.70	44.41	59.67	56.76	600.0224
BMCC	23.74	20.09	26.59	26.67	27.15	27.29	26.59	25.48	26.92	27.45	29.97	31.00	318.6449
Shanghai Novel	16.29	14.84	17.79	11.77	15.30	21.20	22.50	24.20	23.37	24.50	21.11	20.03	232.8983
Huafei	10.37	10.17	15.06	12.33	13.27	12.84	14.36	10.26	10.27	15.61	16.49	15.30	156.33083
SEG	15.44	13.32	19.15	17.70	17.51	18.53	12.70	12.00	18.35	17.56	18.77	20.19	201.2216
Dongguan	11.87	9.37	10.07	13.45	18.50	14.02	17.46	19.50	20.50	20.35	21.62	23.57	200.279
Foshan	6.61	5.46	5.05	8.23	7.31	6.93	7.40	6.43	7.89	9.68	9.40	9.62	90.4854



# **Exhibit 87**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Bruce Lin**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113380.

*(Digital or printed signature here above the line)*

*Bruce Lin*

---

**Bruce Lin**

Project Number: BLLP 2307 P0029

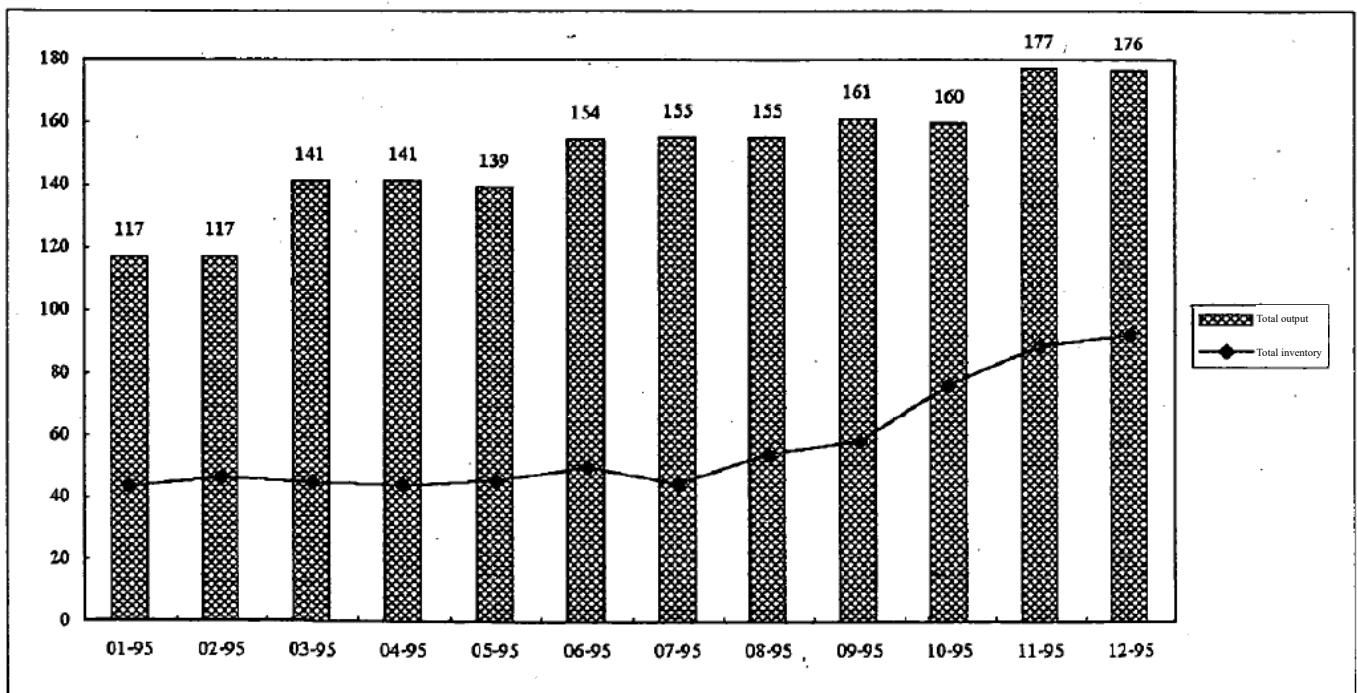
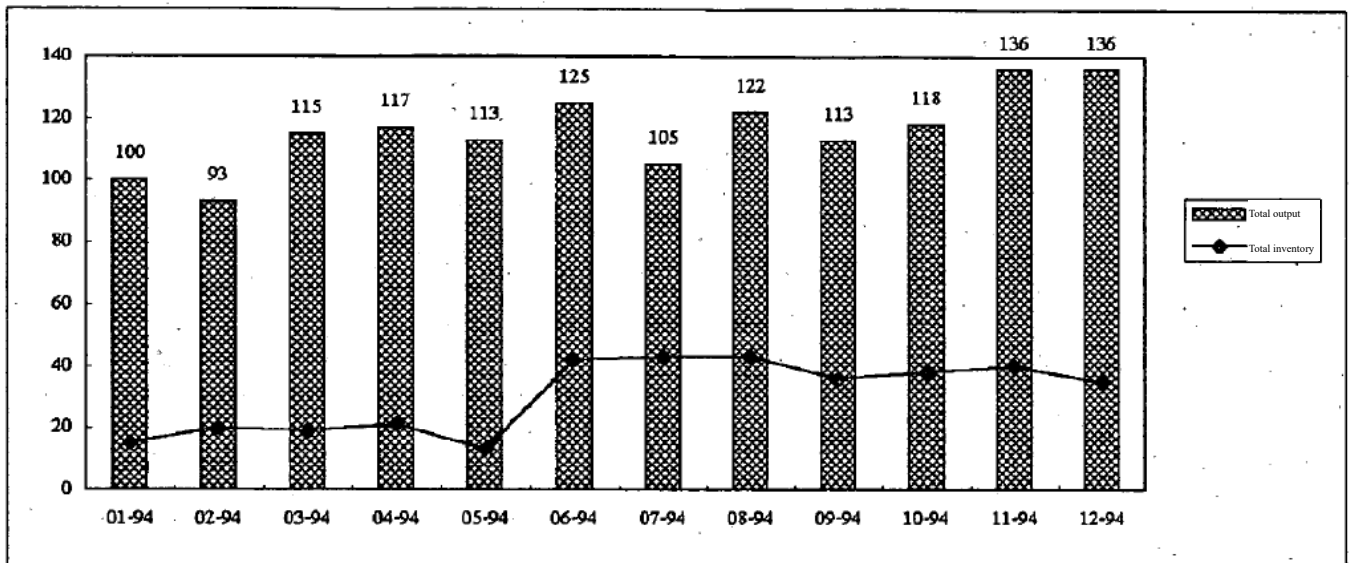
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

Comparison of Production, Sales Volume, and Inventory of CPT of the Nation's Seven Large Color Picture Tube  
Factories in 1994 and 1995

Unit: 10,000 pieces

	01-94	02-94	03-94	04-94	05-94	06-94	07-94	08-94	09-94	10-94	11-94	12-94	Total
Total output	100	93	115	117	113	125	105	122	113	118	136	136	1,393
Total sales volume	99	89	114	112	112	106	105	123	120	118	133	145	1,376
Total inventory	15	20	19	21	13	42	43	43	36	38	40	35	35

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95	Total
Total output	117	117	141	141	139	154	155	155	161	160	177	176	1,793
Total sales volume	114	116	147	141	137	150	143	154	157	140	164	173	1,736
Total inventory	43	46	44	43	45	49	44	54	58	76	88	92	35



# **Exhibit 88**





July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Bruce Lin**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113381.

*(Digital or printed signature here above the line)*

*Bruce Lin*

---

**Bruce Lin**

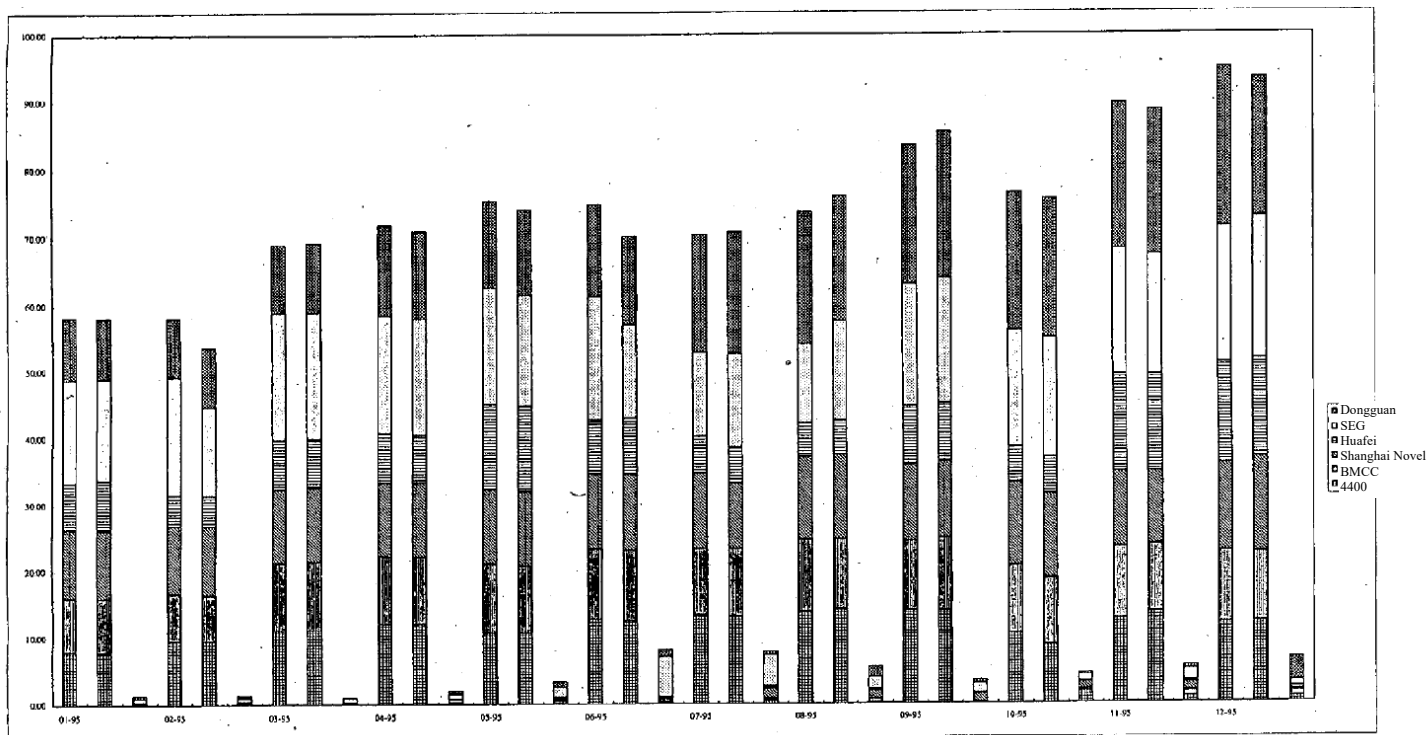
Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## Production, Sales, and Inventory for 21"

Unit: 10,000 pieces

	01-95			02-95			03-95			04-95			05-95			06-95			07-95			08-95			09-95			10-95			11-95			12-95			1-12		
	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production	Sales	Inventory	Production
4400	7.89	7.84	0.02	9.62	9.54	0.09	11.15	11.23	0.08	12.03	12.04	0.04	10.55	10.68	0.00	12.81	12.52	0.26	13.30	13.13	0.43	13.80	14.15	0.08	13.91	13.92	0.09	10.51	8.72	1.88	12.62	13.67	0.84	12.04	12.13	0.75	40.36	139.54	0.75
BMCC	8.17	8.14	0.22	7.06	6.98	0.30	10.12	10.23	0.19	10.20	10.15	0.24	10.37	10.09	0.52	10.49	10.55	0.46	10.00	10.14	0.32	10.80	10.58	0.54	10.44	10.96	0.07	10.14	10.03	0.13	10.84	10.15	0.82	10.79	10.41	0.88	19.44	118.43	0.81
Shanghai Novel	10.23	10.24	0.10	10.28	10.31	0.07	11.19	11.25	0.01	11.19	11.25	0.01	11.30	11.30	0.01	11.30	11.49	0.02	11.45	9.93	1.54	12.96	12.70	1.34	11.59	11.50	1.34	12.51	12.73	1.12	11.32	11.04	1.40	13.16	14.38	0.18	35.46	135.65	0.18
Huafei	7.03	7.56	0.09	4.57	4.56	0.02	7.33	7.29	0.05	7.40	7.04	0.42	12.72	12.69	0.43	8.17	9.37	0.25	5.43	5.41	0.27	5.02	5.17	0.12	8.71	8.81	0.03	5.36	5.47	0.01	14.54	14.42	0.13	15.19	14.82	0.51	101.49	101.59	0.51
SEG	15.44	15.18	0.62	17.70	13.40	0.55	19.15	19.01	0.68	17.70	17.57	0.81	17.51	16.73	1.57	18.53	14.04	6.05	12.70	14.06	4.70	12.00	14.90	1.80	18.35	18.67	1.49	17.56	18.05	1.90	18.77	18.00	1.77	20.19	21.07	0.89	201.22	200.69	0.89
Dongguan	2.41	2.19	0.42	8.86	5.56	0.33	10.02	10.29	0.06	13.36	12.93	0.49	12.85	12.53	0.82	13.11	13.17	1.15	17.46	18.07	0.55	19.50	18.48	1.57	20.50	21.62	0.45	20.35	20.46	0.34	21.62	21.42	0.55	23.57	20.62	3.49	191.03	187.73	3.49
Total	58.19	58.15	1.39	58.09	53.75	1.36	68.91	69.26	1.05	71.88	70.98	2.01	75.41	74.04	3.38	74.81	70.15	8.20	70.34	70.73	7.81	73.63	75.99	5.45	83.45	85.48	3.42	76.43	75.46	4.49	89.72	88.69	5.51	94.96	93.42	6.67	889.00	883.62	6.67



# **Exhibit 89**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Bruce Lin**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113381.

*(Digital or printed signature here above the line)*

*Bruce Lin*

---

**Bruce Lin**

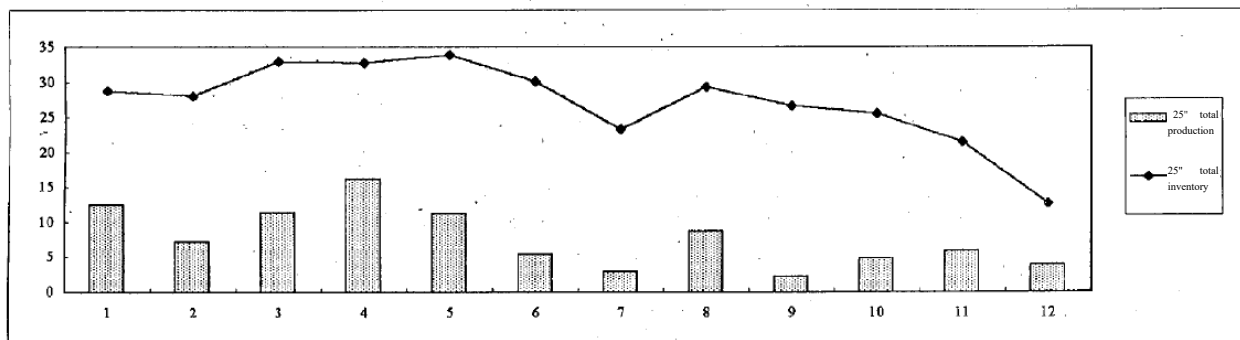
Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

Table of 25" Production and Inventory in 1995

Unit: 10,000 pieces

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95	1--12
4400, 25" production	0.6520	2.0200	4.7456	4.8632	5.1329	4.8960	2.6144	4.065	1.7010	3.5465	4.0608	3.9265	42.2237
Shanghai Novel, 25" production	6.0608	4.5600	6.6000	6.6000	0.0000	0.0000	0.0000	0.000	0.0000	0.0000	0.0000	0.0000	20.2774
Huafei, 25" production	3.3219	0.0803	0.0000	4.7085	0.5553	0.0000	0.3328	4.614	0.4708	1.3194	1.7847	0.0198	17.2078
Dongguan, 25" production	2.4528	0.5061	0.0512	0.0882	5.6432	0.5110	0.0001	0.000	0.0000	0.0000	0.0000	0.0000	9.2526
25" total production	12.4875	7.1664	11.3968	16.2599	11.3314	5.4070	2.9473	8.679	2.1718	4.8659	5.8455	3.9463	88.9615
4400, 25" inventory	0.1316	0.1655	4.6586	4.1340	4.7799	5.1654	0.9728	5.923	5.3214	6.4717	6.5525	8.0252	8.0252
Shanghai Novel, 25" inventory	14.4378	15.9733	19.5643	19.5643	16.6049	14.5827	13.5011	12.978	12.3952	11.5108	10.2595	2.9506	2.9506
Huafei, 25" inventory	2.9058	1.2137	0.0311	2.6758	1.8662	0.4894	0.0068	2.386	2.1332	2.0423	1.6315	0.2898	0.2898
Dongguan, 25" inventory	11.2572	10.6841	8.7373	6.4062	10.6782	9.9478	8.8608	8.034	6.8155	5.4921	3.0184	1.4038	1.4038
25" total inventory	28.7324	28.0366	32.9913	32.7803	33.9292	30.1853	23.3415	29.321	26.6653	25.5169	21.4619	12.6694	12.6694



# **Exhibit 90**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATOR'S DECLARATION:**

I, **Bruce Lin**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113392 to BMCC-CRT000113393.

*(Digital or printed signature here above the line)*

*Bruce Lin*

---

**Bruce Lin**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## Production Plan Prediction of Chinese Color Picture Tube Enterprises in 1995 and 1996

Unit: thousand pieces

	1995											1996											Remarks
	14"	14" display	17"	18"	19"	20"	21"	22"	25"	29"	Total	14"	14" display	17"	18"	19"	20"	21"	22"	25"	29"	Total	
Shaanxi 4400 Factory	2,400	60		1,300			1,450	80	400		5,790	3,200	250		1,300			<del>1,600</del> 1,450 250K	250	400		7,000	It is planned to launch a new production line in April of next year, with capacity to produce 1.5 million 14" and 14" CMTs. Also, production will be halted from September 1 to 20 of this year to renovate 25" production line. After renovation, 25", 22", 21" [hw: illegible] and other types can be produced.
BMCC	670	200			690		1,160			380	3,100	600	400				600	<del>7,800</del> 7,900 5,800K			380	3,880	
Shanghai Novel				800			1,300		200		2,300				860			1,300		320		2,480	A total of 61,000 21" will be exported to Europe (Turkey, Italy) this year. [hw: r 87/FOB]
Nanjing Huafei			350				940		170		1,460			350				1,100		250		1,700	
Shenzhen SEG Hitachi Company							1,950				1,950							2,100				2,100	About 600,000 will be exported this year. In particular, 200,000 will be exported to Hitachi, about 200,000 Europe and the Middle East, and 200,000 indirectly through Furi. [hw: \$ 85/FOB]
Dongguan Caiguan (Color Picture Tubes) Company, Guangdong							1,950		100		2,050							<del>2,100</del> 2,500		100		2,600	
Foshan Caiguan (Color Picture Tubes) Company						850				15	865						1,100				100	1,200	In particular, 30,000 20" will be exported.
Fuzhou Fuxin Caiguan (Color Picture Tubes) Company						100					100							250				250	
Shanghai Dianziguan (Vacuum Tubes) Factory	120										120	300										300	All of 14" will be exported.
Changsha, Hunan											0							<del>640</del> 0		10		650	Will be produced in April
Total	3,190	260	350	2,100	690	950	8,750	180	870	395	17,735	4,100	650	350	2,160	600	1,350	<del>11,100</del> 10,970 10,490	250	1,080	480	22,160	125%



## Production Plan Prediction of Chinese Color Picture Tubes Enterprises in 1995 and 1996

Unit: thousand pieces

	1995											1996											Remarks
	14"	14" display	17"	18"	19"	20"	21"	22"	25"	29"	Total	14"	14" display	17"	18"	19"	20"	21"	22"	25"	29"	Total	
Shaanxi 4400 Factory	2,400	60		1,300			1,450	180	400		5,790	3,200	250		1,300			1,600	250	400		7,600	It is planned to launch a new production line in April of next year, with capacity to produce 1.5 million 14" and 14" CMTs. Also, production will be halted from September 1 to 20 of this year for the renovation of 25" production line, which will be able to produce 25", 22", 21" and other types of products.
BMCC	670	200			690		1,160			380	3,100	600	400			600		1,900			380	3,880	
Shanghai Novel				800			1,300		200		2,300				860			1,300		320		2,480	A total of 61,000 units of 21" products will be exported to Europe (Turkey, Italy) this year.
Nanjing Huafei			350				940		170		1,460			350				1,100		250		1,700	
Shenzhen SEG Hitachi Company							1,950				1,950							2,100				2,100	About 600,000 units will be exported this year. In particular, 200,000 units will be exported to Hitachi, about 200,000 units will be exported to Europe and the Middle East, and 200,000 units will be exported indirectly through Furi.
Dongguan Caiguan (Color Picture Tubes) Company, Guangdong							1,950		100		2,050							2,500		100		2,600	
Foshan Caiguan (Color Picture Tubes) Company						850				15	865						1,100				100	1,200	In particular, 30,000 units of 20" will be exported
Fuzhou Fuxin Caiguan (Color Picture Tubes) Company						100					100						250					250	
Shanghai Dianziguan (Vacuum Tubes) Factory	120										120	300										300	All of 14" will be exported.
Changsha, Hunan											0							640		10		650	
Total	3,190	260	350	2,100	690	950	8,750	180	870	395	12,735	4,100	650	350	2,160	600	1,350	1,140	250	1,080	480	22,160	
<p>Note: 1. In 1996, the output of color picture tubes increased by 25% compared with that in 1995, of which 21" increased by 27%, and the output of color TVs is expected to increase by 8%-10%. Therefore, we need to further study and discuss in details about the trend and change for domestic sales of 21" next year.</p> <p>2. The production line renovation of several major color picture tube factories has been completed. 21", 25", and 18" compatible production conditions have been met. However, two 21" production lines of BMCC are special lines, so it is unable to change the status of positioning sales based on production and it is not easy to respond in case of market change. Due to the unique characteristics of BMCC, our company should strengthen the development of 21" export channels and stabilize the production of BMCC with both domestic and foreign markets.</p>																							

# **Exhibit 91**



**certifiedtranslate**  
A LANGUAGE FISH LLC COMPANY

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A member of the American  
Translators Association  
ATA Member Number: 248719

## CERTIFIED TRANSLATION

### Description of Document(s):

<b>CHART RE:</b>
<b>CHINA CRT PRODUCTION STATUS 1993-1998</b>
<b>BMCC-CRT000113394</b>

Source Language: <b>CHINESE</b>	Target Language: <b>ENGLISH</b>
---------------------------------	---------------------------------

WITH REFERENCE TO THE ABOVE MENTIONED MATERIALS/DOCUMENTS, we at Language Fish LLC (doing business as www.certifiedtranslate.com), a professional document translation company, attest that the language translation completed by Language Fish's certified professional translators, represents, to the best of our judgment, an accurate and correct interpretation of the terminology/content of the source document(s). **This is to certify the correctness of the translation only.** We do not guarantee that the original is a genuine document or that the statements contained in the original document(s) are true.

IN WITNESS WHEREOF, Language Fish LLC has caused the Certificate to be signed by its duly authorized officer(s).

**By:** Sean Kirschenstein, Director

**Date:** March 18, 2022

A copy of the translated version(s) is attached to this statement of certification.



95H-04.5

## China CRT Production Status Chart 1993 to 1998

Marketing Dept. 1995.3.14

Units: Thousands																																										
Units	95%														94%														93%													
	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL			
BMCC	733				501				580				71	2284	740	24		740		1107		257	2861	507	250		571									392	3050					
4400	957			611	30			1224	417	5			71	3247	1750	0	0	1050	0	1210	130	250		4400	2200	100	0	1000	0								1200	200	500	5200		
SEG Hitachi								1380						1380						1780				1780													1800	1800				
Michael Co.					22	3					12		38				0			100				100													100	100				
Huafei Co.		34						781		200			1271		0	160			810		230		1300		0	350									800	750	1400					
Novel Co.				200				725		13			842				180		870		470		1620					450							1250	300	0	2000				
Fuxin Co.					1	69							81						100		0		100											500		300						
Guangdong Dongguan								88		11			104						1060		200		1260											0	1200	300	1500					
Chengdu 773 Plant										20			20								100		100													0	0					
Shanghai Electronic Tube	2				35	25							83	150					0	0			150	300										0	100		400					
Changsha CRT Plant								20					20						80				80											0	100		100					
Foshan CRT Plant								277					29	305					810				0	610										500	0		100	1000				
Total	1691	34	815	531	336	5292	417	258	12	99	9504	2840	24	180	1229	240	710	2210	130	1285	257	14361	3100	354	350	1450	670	1300	7720	200	1359	483	16855									

Units: Thousands																																										
Units	95%														94%														93%													
	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL			
BMCC	588	378		535			1636						389	3726	606	529			894		2320		380	3921	639	504									2000	388	4306					
4400	2400	100	1000	0	0	0	1200	200	500				3430	2400	100	0	1300	0			1200	200	500	5400	2500	500									1400	100	500	6000				
SEG Hitachi							1600						1800						1800				1800														2000	2000				
Michael Co.													0						0				0														0	0				
Huafei Co.		100				350	838		300				1530		500	250			800		380		1900		800	250								800	350	2200						
Novel Co.			450			1100		300	100	1500			100			450			1200		400	300	2450		500								450		200	400	200	2750				
Fuxin Co.					300								330						300				300											300		300						
Guangdong Dongguan							1300		350				1500						1300		350		1600												400	350	1750					
Chengdu 773 Plant													0						100		20	40	150												800	100	100	1000				
Shanghai Electronic Tube													500										500														500	500				
Changsha CRT Plant							600		190				750									800													700	150	900					
Foshan CRT Plant							1000						100	1100					1000				100													900	100					
Total	3488	578	1450	530	1300	350	8630	200	1600	560	18700	3528	1229	250	1450	394	1300	9209	200	1770	800	19941	3600	2304	250	1450	715	500	10380	100	1850	798	21750									

Note: Others = 22", 17", 28" combined

Units	95%														94%														93%													
	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL			
93%	1691	34	815	531	336	5292	417	258	12	99	9504	2840	24	180	1229	240	710	2210	130	1285	257	14361	3100	354	350	1450	670	1300	7720	200	1359	483	16855									
94%	2400	100	1000	0	0	1200	200	500				3430	2400	100	0	1300	0			1200	200	500	5400	2500	500											1400	100	500	6000			
95%	3100	350	1450	530	1300	7720	1350	450	550	16300	16850	350	200						1300	350		1600														400	350	1750				
96%	3488	578	1450	530	1300	8630	1600	580	550	18150	18700	250	200						1000			100														900	100	1000				
97%	3508	1229	1450	564	1300	5030	1770	920	450	19491	19941	250	200																													
98%	3600	2304	1450	715	500	10380	1650	798	500	21400	21750	250	200																													

Ratio	95%														94%														93%													
	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL	14"	17"	18"	19"	20"	21"	22"	23"	24"	25"	26"	27"	TTL			
93%	18%	0%	3%	6%	4%	56%	2%	1%	5%	100%																																
94%	18%	0%	3%	6%	4%	56%	2%	1%	5%	100%																																
95%	18%	2%	3%	4%	7%	48%	8%	3%	3%	100%																																
96%	19%	3%	3%	3%	7%	46%	8%	3%	3%	100%																																
97%	18%	6%	7%	2%	7%	45%	9%	4%	2%	100%																																
98%	17%	11%	7%	3%	1%	48%	9%	4%	2%	100%																																

# **Exhibit 92**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **YangJunjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113395.

*(Digital or printed signature here above the line)*

*Yang Junjun*

---

**Yang Junjun**

Project Number: BLLP 2307 P0029

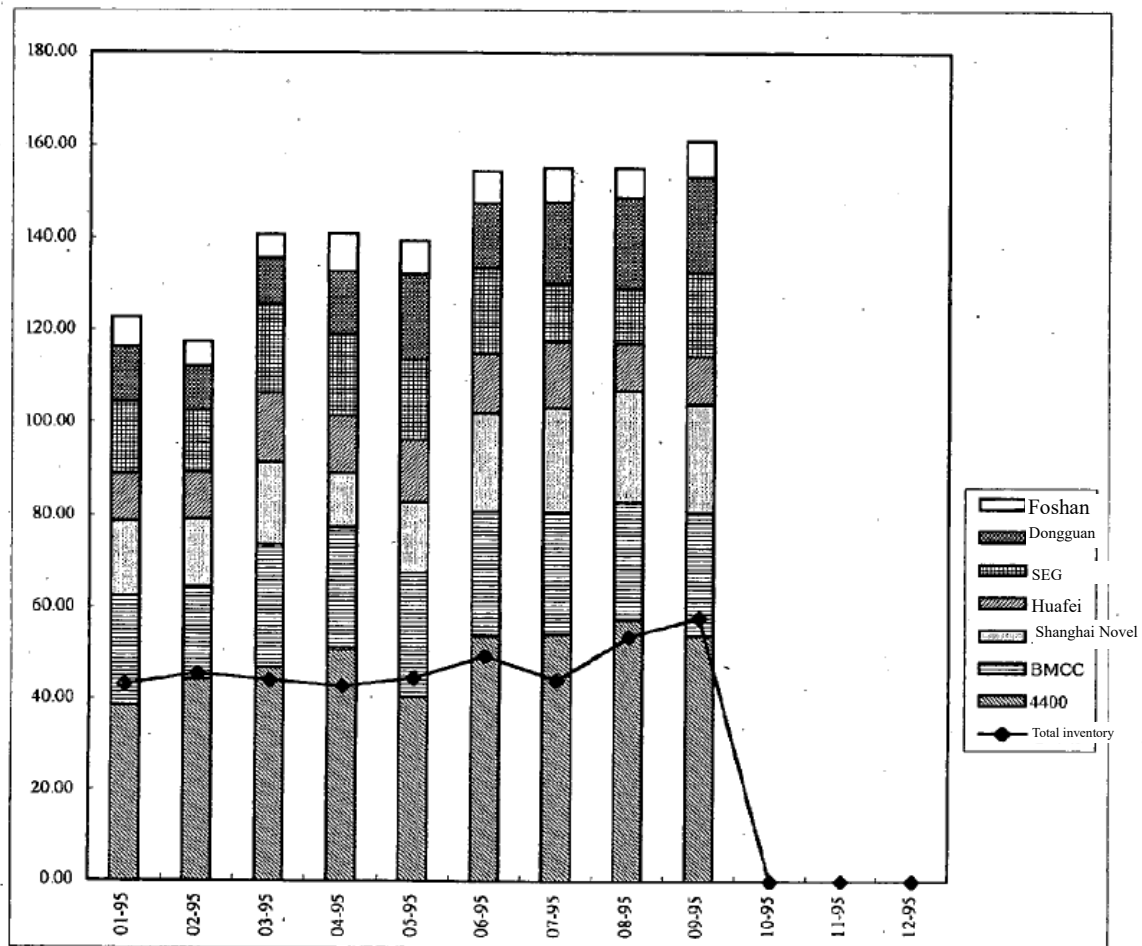
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## CPT Trend

## Domestic CPT Production and Inventory Chart

Unit: ten thousands

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95
Total output	122.88	117.47	140.67	140.84	139.35	154.35	155.06	155.02	161.01	0.00	0.00	0.00
Total sales volume	114.11	115.99	147.21	141.40	137.32	150.44	142.77	154.11	157.74	0.00	0.00	0.00
Total inventory	43.24	45.51	44.07	42.84	44.56	49.35	44.00	53.50	57.69	0.00	0.00	0.00
4400	38.57	44.21	46.96	50.71	40.31	53.54	54.04	57.15	53.70	0.00	0.00	0.00
BMCC	23.74	20.09	26.59	26.67	27.15	27.29	26.59	25.48	26.92	0.00	0.00	0.00
Shanghai Novel	16.29	14.84	17.79	11.77	15.30	21.20	22.50	24.20	23.37	0.00	0.00	0.00
Huafei	10.37	10.17	15.06	12.33	13.27	12.84	14.36	10.26	10.27	0.00	0.00	0.00
SEG	15.44	13.32	19.15	17.70	17.51	18.53	12.70	12.00	18.35	0.00	0.00	0.00
Dongguan	11.87	9.37	10.07	13.45	18.50	14.02	17.46	19.50	20.50	0.00	0.00	0.00
Foshan	6.61	5.46	5.05	8.23	7.31	6.93	7.40	6.43	7.89	0.00	0.00	0.00



# **EXHIBIT 23**



# **Exhibit 93**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **Yang Junjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113396.

*(Digital or printed signature here above the line)*

Yang Junjun

---

**Yang Junjun**

Project Number: BLLP 2307 P0029

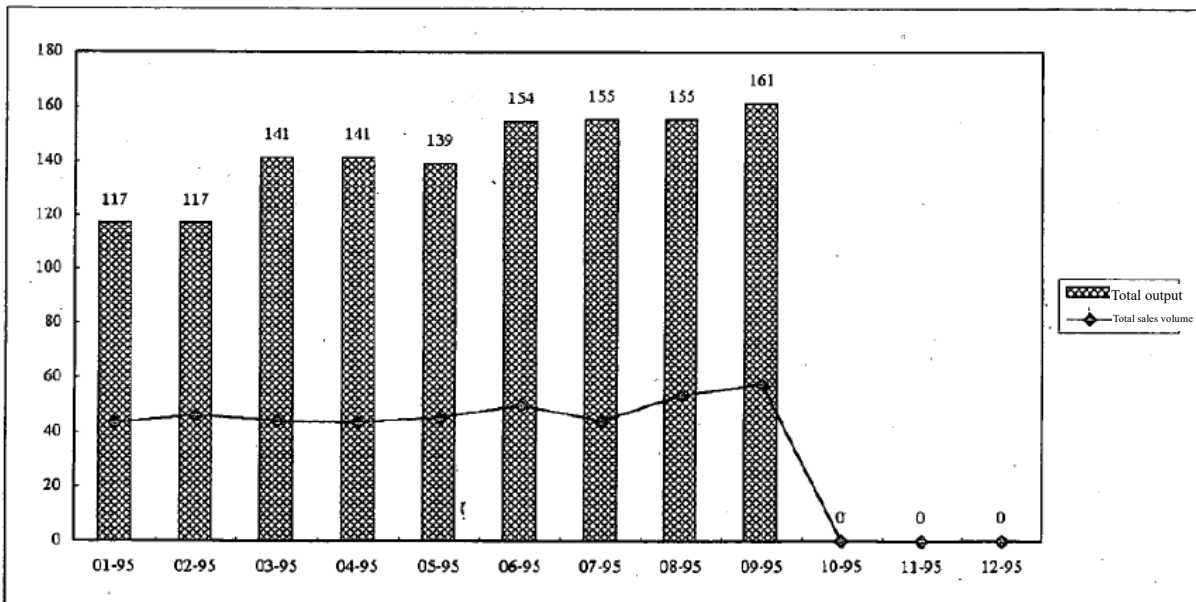
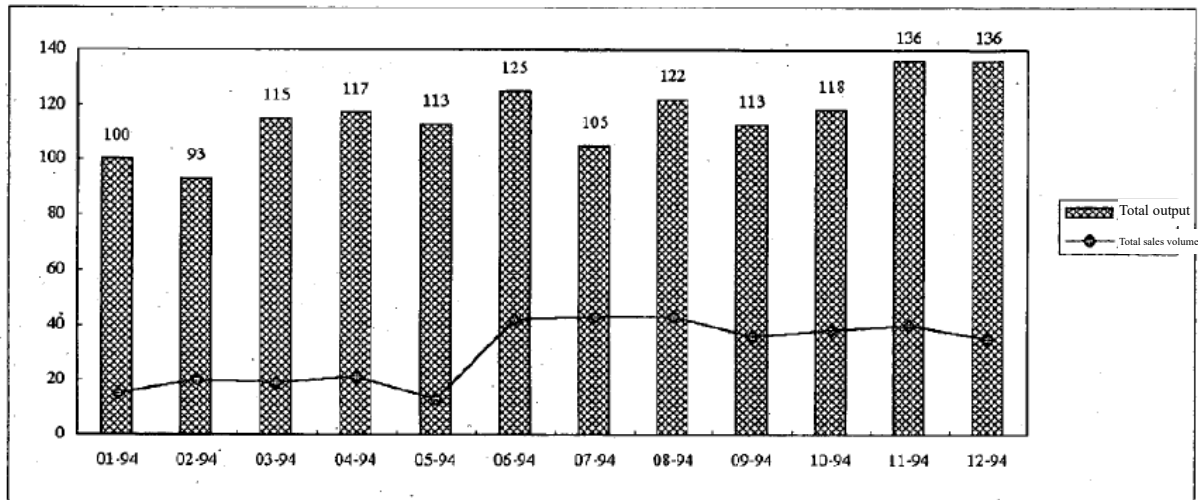
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

Comparison of CPT Output, Sales Volume, and Inventory among the Top 7  
Color Tube Manufacturers in China in 1994 and 1995

Unit: ten thousand pieces

	01-94	02-94	03-94	04-94	05-94	06-94	07-94	08-94	09-94	10-94	11-94	12-94	Total
Total output	100	93	115	117	113	125	105	122	113	118	136	136	1393
Total sales volume	99	89	114	112	112	106	105	123	120	118	133	145	1376
Total sales volume	15	20	19	21	13	42	43	43	36	38	40	35	35

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95	Total
Total output	117	117	141	141	139	154	155	155	161	0	0	0	1280
Total sales volume	114	116	147	141	137	150	143	154	158	0	0	0	1260
Total sales volume	43	46	44	43	45	49	44	54	58	0	0	0	35



# **Exhibit 94**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **Yang Junjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113397.

*(Digital or printed signature here above the line)*

*Yang Junjun*

---

**Yang Junjun**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870



# **Exhibit 95**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **Yang Junjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113398.

*(Digital or printed signature here above the line)*

Yang Junjun

---

**Yang Junjun**

Project Number: BBLLP 2307 P0029

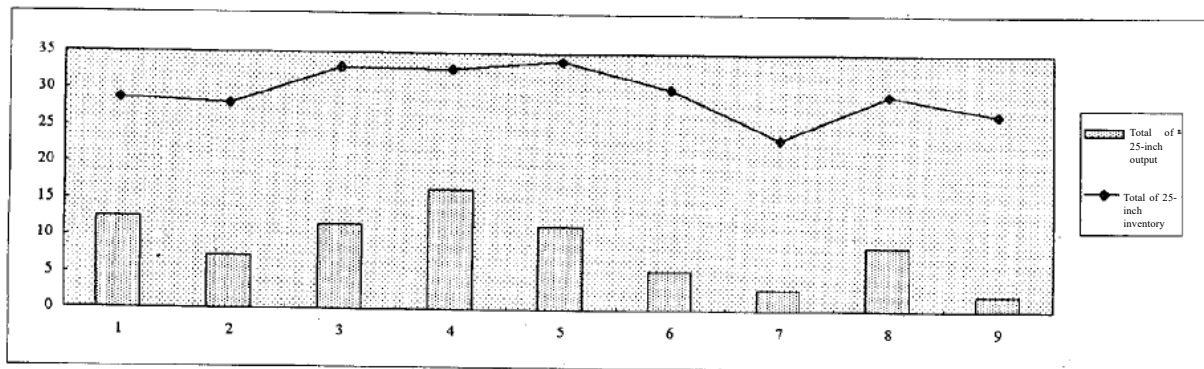
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870



## Output and Inventory of 25-inch in 1995

Unit: ten thousand pieces

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	1--12
4400 Output of 25-inch	0.6520	2.0200	4.7456	4.8632	5.1329	4.8960	2.6144	4.065	1.7010	30.6899
Shanghai Novel Output of 25-inch	6.0608	4.5600	6.6000	6.6000	0.0000	0.0000	0.0000	0.000	0.0000	20.2774
Huafei Output of 25-inch	3.3219	0.0803	0.0000	4.7085	0.5553	0.0000	0.3328	4.614	0.4708	14.0839
Dongguan Output of 25-inch	2.4528	0.5061	0.0512	0.0882	5.6432	0.5110	0.0001	0.000	0.0000	9.2526
Total of 25-inch output	12.4875	7.1664	11.3968	16.2599	11.3314	5.4070	2.9473	8.679	2.1718	74.3038
4400 Inventory of 25-inch	0.1316	0.1655	4.6586	4.1340	4.7799	5.1654	0.9728	5.923	5	
Shangyong Inventory of 25-inch	14.4378	15.9733	19.5643	19.5643	16.6049	14.5827	13.5011	12.978	12	
Huafei Inventory of 25-inch	2.9058	1.2137	0.0311	2.6758	1.8662	0.4894	0.0068	2.386	2	
Dongguan Inventory of 25-inch	11.2572	10.6841	8.7373	6.4062	10.6782	9.9478	8.8608	8.034	7	
Total of 25-inch inventory	28.7324	28.0366	32.9913	32.7803	33.9292	30.1853	23.3415	29.321	27	



# **Exhibit 96**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **Yang Junjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113399.

*(Digital or printed signature here above the line)*

*Yang Junjun*

---

**Yang Junjun**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

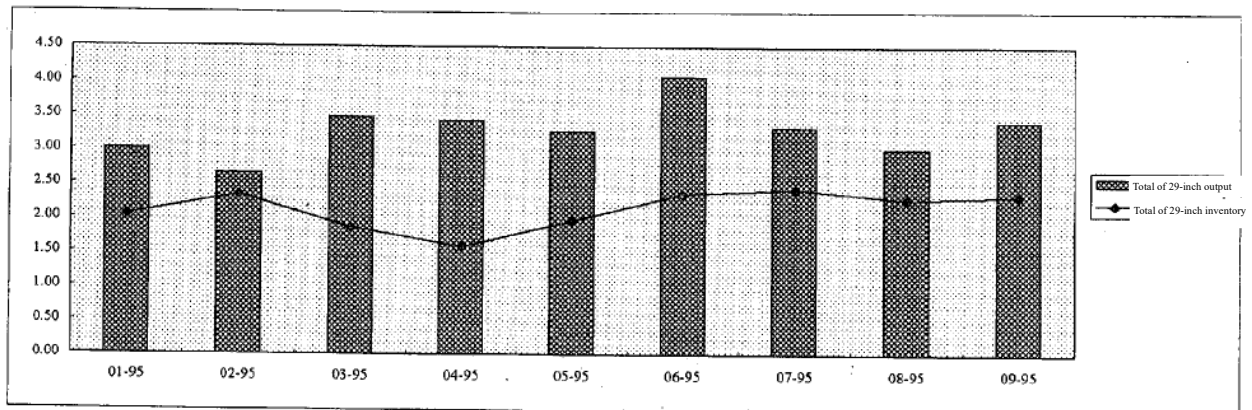
Output, Sales Volume, and Inventory of 29-inch  
in 1995

Unit: ten thousand pieces

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	1--12
BMCC Output of 29-inch	3.0046	2.5807	3.4725	3.0717	3.2577	4.0627	3.3263	3.0101	3.4108	29.1971
Foshan Output of 29-inch	0.0000	0.0647	0.0000	0.3440	0.0000	0.0000	0.0000	0.0000	0.0000	0.4087
Total of 29-inch output	3.0046	2.6454	3.4725	3.4157	3.2577	4.0627	3.3263	3.0101	3.4108	29.6058

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	1--12
BMCC Sales volume of 29-inch	2.3824	2.0407	3.9013	3.3963	2.8113	3.4477	3.2991	3.1590	3.3571	27.7949
Foshan Sales volume of 29-inch	0.0155	0.3173	0.0500	0.3001	0.0632	0.2150	0.0000	0.0000	1.0000	1.9611
Total of 29-inch sales volume	2.3979	2.3580	3.9513	3.6964	2.8745	3.6627	3.2991	3.1590	4.3571	29.7560

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	1--12
BMCC Inventory of 29-inch	1.2296	1.7696	1.3408	1.0162	1.4626	2.0776	2.1464	1.9975	2.0512	
Foshan Inventory of 29-inch	0.8132	0.5606	0.5102	0.5520	0.4909	0.2759	0.2759	0.2759	0.2707	
Total of 29-inch inventory	2.0428	2.3302	1.8510	1.5682	1.9535	2.3535	2.4223	2.2734	2.3219	



# **Exhibit 97**



July 21, 2023

**Certification**

**Welocalize Translations**

**TRANSLATORS DECLARATION:**

I, **Yang Junjun**, hereby declare:

That I possess advanced knowledge of the Chinese and English languages. The attached Chinese into English translation has been translated by me and to the best of my knowledge and belief, it is a true and accurate translation of the document with bates number: BMCC-CRT000113400.

*(Digital or printed signature here above the line)*

*Yang Junjun*

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**Yang Junjun**

Project Number: BBLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

### Analysis of Color Tube Inventory in August 1995

January to August 1995 saw a peak of the inventory of Top 7 Color Tube manufactureres in August, with a total of 535,000 pieces, including 290,000 pieces for 25-inch, 55,000 pieces for 21-inch, 15,000 pieces for 29-inch, and 17,500 for others sized below 21 inches

Inventory is featured by:

the inventory of 25-inch is still at a high level, while the inventory of those for small screens below 21-inch is rapidly growing..

Cause analysis:

1. At present, the sales market of color TV sets has started slowly, lagging behind last year.
2. The manufacturers for complete color TV sets has a large inventory of complete color TV sets and color tubes.
3. Difficulty obtaining loans and insufficient liquidity.

Trend forecast for Q4:

Color TV sales volumes steadily rebound, leading to a corresponding reduction in color tube inventories. End of this year through the beginning of 1996 is expected to mark a boom season of sales.

# **Exhibit 98**





July 21, 2023

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Yang Junjun

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**Yang Junjun**

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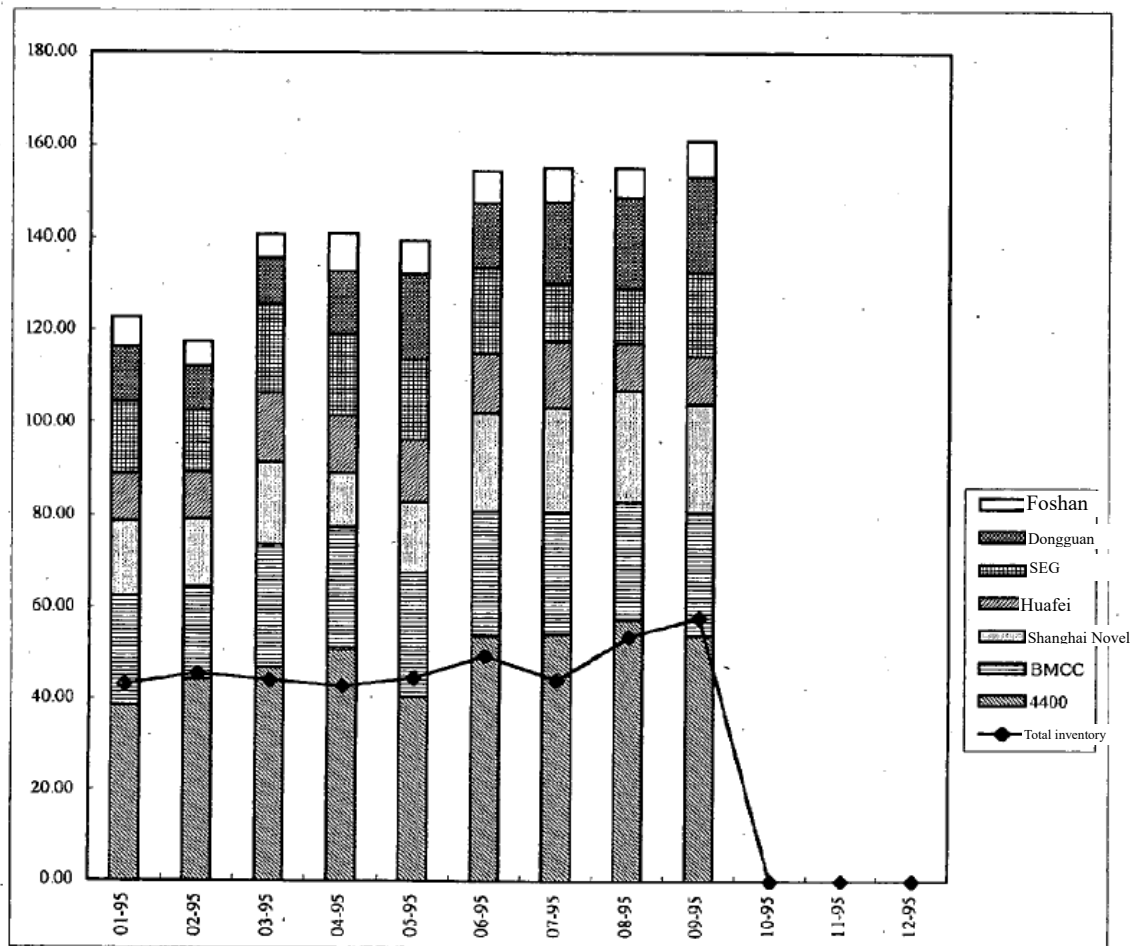
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

## CPT Trend

Domestic CPT Production and Inventory Chart

Unit:ten thousands

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95
Total output	122.88	117.47	140.67	140.84	139.35	154.35	155.06	155.02	161.01	0.00	0.00	0.00
Total sales volume	114.11	115.99	147.21	141.40	137.32	150.44	142.77	154.11	157.74	0.00	0.00	0.00
Total inventory	43.24	45.51	44.07	42.84	44.56	49.35	44.00	53.50	57.69	0.00	0.00	0.00
4400	38.57	44.21	46.96	50.71	40.31	53.54	54.04	57.15	53.70	0.00	0.00	0.00
BMCC	23.74	20.09	26.59	26.67	27.15	27.29	26.59	25.48	26.92	0.00	0.00	0.00
Shanghai Novel	16.29	14.84	17.79	11.77	15.30	21.20	22.50	24.20	23.37	0.00	0.00	0.00
Huafei	10.37	10.17	15.06	12.33	13.27	12.84	14.36	10.26	10.27	0.00	0.00	0.00
SEGSEG	15.44	13.32	19.15	17.70	17.51	18.53	12.70	12.00	18.35	0.00	0.00	0.00
Dongguan	11.87	9.37	10.07	13.45	18.50	14.02	17.46	19.50	20.50	0.00	0.00	0.00
Foshan	6.61	5.46	5.05	8.23	7.31	6.93	7.40	6.43	7.89	0.00	0.00	0.00



# **Exhibit 99**



July 21, 2023

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Yang Junjun

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**Yang Junjun**

Project Number: BBLLP 2307 P0029

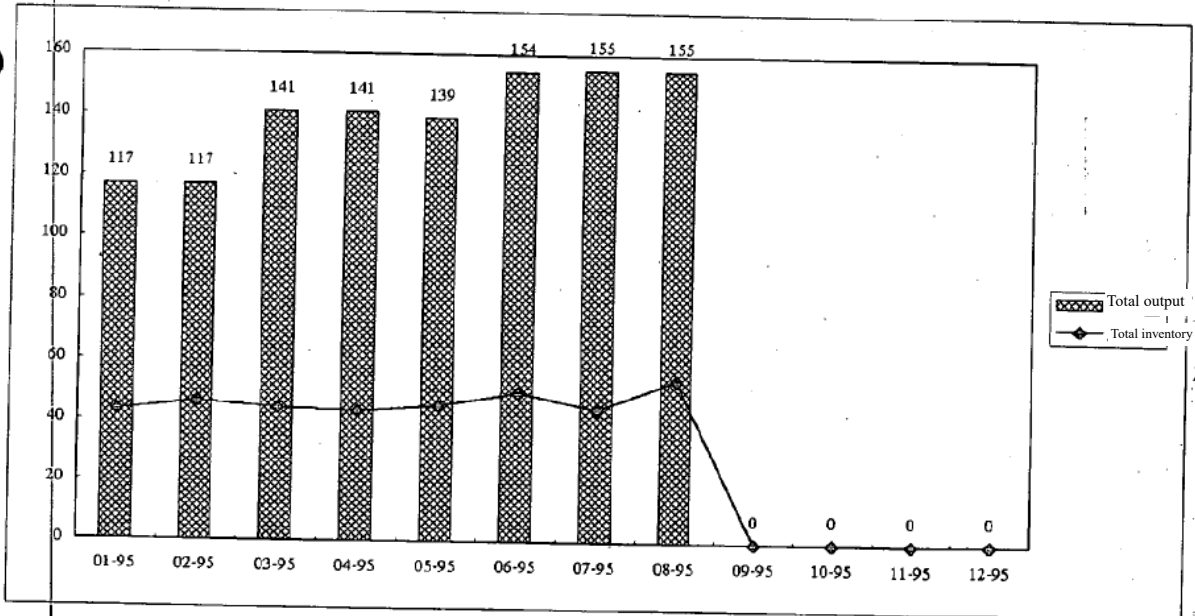
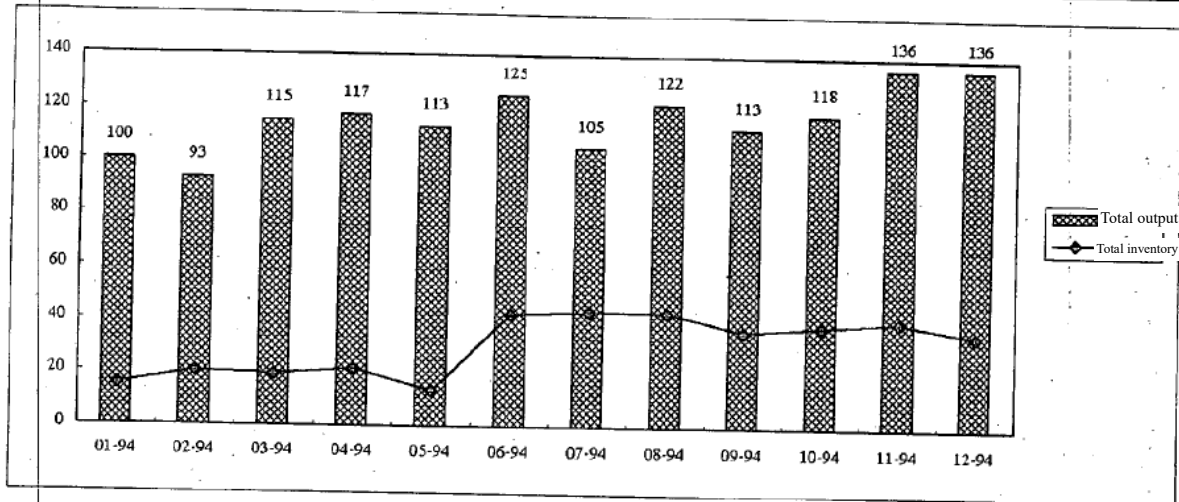
15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

Comparison of CPT Output, Sales Volume, and Inventory among the Top 7 Color  
Tube Manufacturers in China in 1994 and 1995

Unit: ten thousand pieces

	01-94	02-94	03-94	04-94	05-94	06-94	07-94	08-94	09-94	10-94	11-94	12-94	合计
Total output	100	93	115	117	113	125	105	122	113	118	136	136	1392
Total sales volume	99	89	114	112	112	106	105	123	120	118	133	145	1376
Total inventory	15	20	19	21	13	42	43	43	36	38	40	35	35

	01-95	02-95	03-95	04-95	05-95	06-95	07-95	08-95	09-95	10-95	11-95	12-95	合计
Total output	117	117	141	141	139	154	155	155	0	0	0	0	1119
Total sales volume	114	116	147	141	137	150	143	154	0	0	0	0	1102
Total inventory	43	46	44	43	45	49	44	54	0	0	0	0	35



# **Exhibit 100**



July 21, 2023

**Certification**

**Welocalize Translations**

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Yang Junjun

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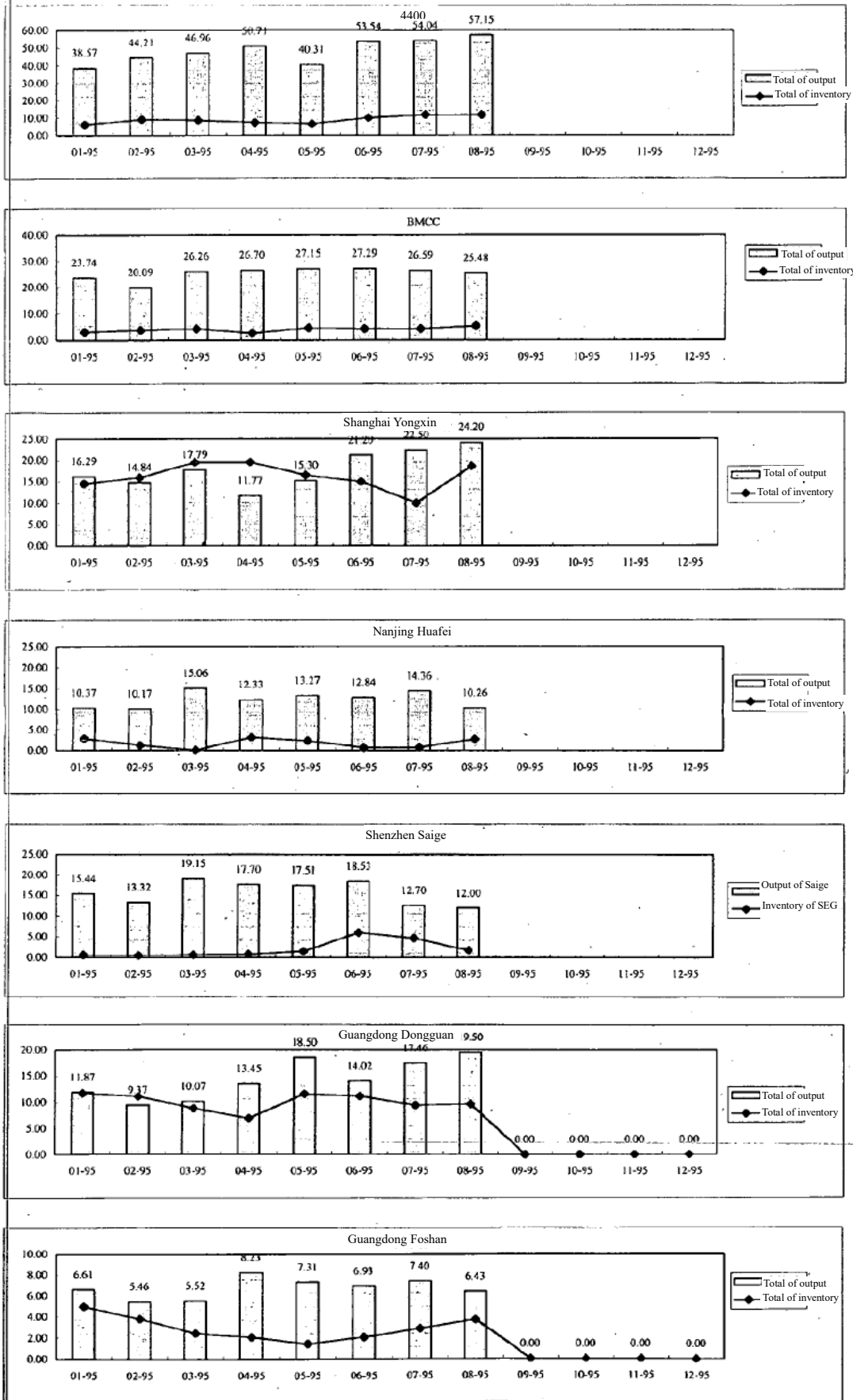
**Yang Junjun**

Project Number: BLLP 2307 P0029

15 W. 37th Street 4th Floor  
New York, NY 10018  
212.581.8870

Comparison of Color Tube Output and Inventory among the Top 7 Color Tube Manufacturers in China in 1995

Unit: ten thousand pieces



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